SALVATION ARMY DIVISION CAMP AND RETREAT CENTER

APPENDIX A

Notice of Preparation and Responses



GARY L. PRYOR DIRECTOR (858) 694-2962

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666 INFORMATION (858) 694-2960 TOLL FREE (800) 411-0017 SAN MARCOS OFFICE

338 VIA VERA CRUZ - SUITE 201

SAN MARCOS, CA 92069-2620

(760) 471-0730

EL CAJON OFFICE 200 EAST MAIN ST. - SIXTH FLOOR EL CAJON, CA 92020-3912 (619) 441-4030

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

March 16, 2000

NOTICE IS HEREBY GIVEN that the County of San Diego is requesting public input regarding the preparation of an Environmental Impact Report in accordance with the California Environmental Quality Act for the following projects. These Notices of Preparation can be reviewed at the Department of Planning and Land Use (DPLU), Project Processing Counter, 5201 Ruffin Road, Suite B, San Diego, California 92123 and at the public library(ies) listed below. Comments on these Notices of Preparation must be sent to the DPLU address listed above and should reference the project number and name.

MAJOR USE PERMIT P70-379W²; LOG NO. 98-14-023. Salvation Army Divisional Camp and Retreat Specific Plan. The proposed project is a major modification of a Major Use Permit P70-379W¹ and a Specific Plan. The project is a proposal for a 20 Year Master Plan to expand an existing 575 acre camp and retreat for the Salvation Army. Zoning Ordinance Section 2705 requires a Major Use Permit for this use in an A70 zone. The phased 20 Year Master Plan proposes tent camping, nature studies camping, and conferencing for a maximum capacity of 850 people. The proposed Specific Plan for the 20 year phased expansion of the Salvation Army Divisional Camp and Retreat would include the following major components:

Expanded Cabin Camping Component
Expanded and Relocated Tent Camping Component
Nature Study/Educational Camp Component
Expanded and Relocated Conference Component
Expanded Remote Over-night Camp Areas
Recreational Vehicle Parking Area
Expanded Support Facilities

The Salvation Army property is located at 14488 Mussey Grade Road in the Ramona Community Planning Area, in central San Diego County. Comments on this proposed Notice of Preparation must be received no later than April 14, 2000 at 4:00 p.m. (a 30 day public review period). This proposed Notice of Preparation can also be reviewed at the Ramona Branch Library, located at 406 Montecito Road, Ramona, CA 92065. For additional information, please contact Glenn S. Russell at (858) 694-2981 or by e-mail at grussepl@co.san-diego.ca.us.

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March 16, 2000

NOTICE IS HEREBY GIVEN that the County of San Diego is requesting public input regarding the preparation of an Environmental Impact Report in accordance with the California Environmental Quality Act for the following projects. These Notices of Preparation can be reviewed at the Department of Planning and Land Use (DPLU), Project Processing Counter, 5201 Ruffin Road, Suite B, San Diego, California 92123 and at the public library(ies) listed below. Comments on these Notices of Preparation must be sent to the DPLU address listed above and should reference the project number and name.

__MUP70-379W2; , Log No. _ 98-14-023______; __; Salvation Army Divisional Camp and Retreat Specific Plan____. The project is the __The proposed project is a major modification of a major use permit P70-379W¹ and a Specific Plan. The project is a proposal for a twenty-year master plan to expand an existing 575 acre camp and retreat for the Salvation Army. Zoning ordinance section 2705 requires a major use permit for this use in an A-70 zone. The phased twenty year master plan proposes tent camping, nature studies camping, and conferencing for a maximum capacity of 850 people. The proposed Specific Plan for the 20-year phased expansion of the Salvation Army Divisional Camp and Retreat would include the following major components:

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SPECIFIC PLAN FOR THE SALVATION ARMY DIVISIONAL CAMP AND RETREAT RAMONA, SAN DIEGO COUNTY

PROJECT LOCATION:

The proposed project area is located at 14488 Mussey Grade Road in the Ramona Community Planning Area, in Central San Diego County (see Figure 1.1-1). The 575-acre property is situated on the western side of Mussey Grade Road, south of Highway 67 and north of the San Vicente Reservoir (portions of Section 6, Township 14 South, Range 1 West; and Sections 1 and 12, Township 14 South, Range 1 East; San Vicente Reservoir 7.5-Minute USGS Quadrangle, San Bernardino Base Meridian)(see Figure 1.1-2).

PROJECT DESCRIPTION:

The proposed Specific Plan for the 20-year phased expansion of the Salvation Army Divisional Camp and Retreat would include the following major components:

- Expanded Cabin Camping Component. The proposed Specific Plan would increase the existing five masonry cabins to a total of 12 cabins, with toilets and showers in each cabin. This component would include a building for arts and crafts, an office and a small laundry facility, and a rustic outdoor amphitheater constructed of elevated wooden logs for seating. Maximum capacity for this component would be 240 occupants.
- Expanded and Relocated Tent Camping Component. The proposed Specific Plan would relocate six existing Yurts and add nine more for a total of 15 Yurts. This component would include a toilet and bath building, an open-aired ramada for light eating, and a rustic outdoor amphitheater constructed of elevated wooden logs for seating. Maximum capacity for this component would be 100 occupants.

- Nature Study/Educational Camp Component. This new component would include nine cabins, each with toilet and shower facilities; a building for six classrooms, a library and map room, an observatory, an office, and a small laundry; a small dining pavilion; and an outdoor amphitheater with concrete steps for seating. Maximum capacity for this component would be 180 occupants.
- Expanded and Relocated Conference Component. The proposed Specific Plan would relocate the existing conferencing facility to the northern portion of the site and construct five, two-story motel style buildings to accommodate guests; a building with a flexible meeting room, kitchen and breakout space; and two tennis courts, a swimming pool and a shower/toilet/spa building. Maximum capacity for this component would be 175 guests.
- Expanded Remote Overnight Camp Areas. The proposed Specific Plan would increase the one existing hike-in camp area to a total of three, with fire rings, brush clearance within 50 feet of the rings and a 50 gallon water basin at each camp area. These camp areas would be intended for overnight visits by eight to ten individuals home-based at either the Cabin Camp or Tent Camp.
- <u>Recreational Vehicle Parking Area</u>. This new component would include 15 spaces on approximately 1.5 acres and a dump station for visitors with recreational vehicles to stay overnight. Maximum capacity for this component would be 30 users.
- Expanded Support Facilities. The proposed Specific Plan would also include: a 24,000 square foot central dining facility to serve the Cabin Camping, Tent Camping and Nature Study/Educational Camp components; a 21,000 square foot multi-purpose building to service the Cabin Camping, Tent Camping and Nature Study/Educational Camp components; a 2,000 square foot mini-theater adjacent to the multi-purpose building; a 3,500 square foot central administrative cluster to house administrative offices, a small infirmary and small convenience store (existing Ranch House and Clinic that house these function would be converted to staff support uses); four 500 square foot arts and crafts ramadas; a 3,600 square foot maintenance building and 1,200 square foot supply building (existing maintenance facilities would be demolished); recreation areas, including tennis and basketball courts, a large swimming pool and 2,500 square foot bathhouse, and existing open play fields; 31,500 square feet of staff housing for a maximum of 64 staff (including conversion of the five existing Lodge Cabins to staff housing); 188 parking spaces; a package wastewater treatment plant; and an eight-inch water line (replacing existing six-inch water line) under Mussey Grade Road and the existing site access roads from Highway 67 to the camp site.

DISCRETIONARY ACTIONS REQUIRED:

The project would require approval of the following: a Specific Plan, Major Use Permit Modification (P70-379W) and exemption from Board Policy I-78 by the County of San Diego; a package wastewater treatment plant by the County of San Diego, Air Pollution Control District, San Diego County Local Agency Formation Commission, California Regional Water Quality Control Board (RWQCB), and, possibly, the Ramona Municipal Water District; a Streambed Alteration Agreement by the California Department of Fish and Game (CDFG); a Section 401 (Clean Water Act) Certification from the RWQCB; and a Section 404 (Clean Water Act) Permit by the U.S. Army Corps of Engineers.

PROBABLE ENVIRONMENTAL IMPACTS:

The following issues have the potential for significant impact to the environment:

Land Use and Planning - The project's compatibility with the Scenic Highway Element of the San Diego County General Plan, the Ramona Community Plan, the Ramona Design Guidelines, Board Policy I-78, the County of San Diego Multiple Species Conservation Program Subarea Plan, and the County Resource Protection Ordinance (RPO) will be analyzed in the Program Environmental Impact Report (EIR). A steep slope analysis will be provided in accordance with RPO. Significant visual quality/grading, biological resources and noise impacts will be reduced to below a level of significance.

<u>Population/Housing</u> - The Program EIR will analyze the growth inducing potential of replacing the six-inch water line under Mussey Grade Road with an eight-inch water line. Specifically, the analysis will discuss what additional development, if any, could occur due to the increased water availability. The analysis will take into consideration the development potential of lots that are currently undevelopable with the existing water availability, and will address the issue of a water reservoir, if one is required by the water district.

<u>Geologic Issues</u> - The Salvation Army property consists largely of steep slopes with a greater than 25 percent gradient and shallow, excessively drained soils with severe erosion potentials. The potential for geological impacts associated with highly erosive soils will be analyzed in the Program EIR.

<u>Water Resources</u> - Several ephemeral and intermittent drainages pass through or are contiguous to the Salvation Army property, including three "blue line" drainages. A package wastewater treatment plant would have the potential to impact the quality of surface and ground waters through the inadvertent release of contaminants (i.e., undertreated effluent or hazardous chemicals). In addition, runoff from roadways, paved parking areas and developed portions of the site has the potential to degrade water quality. At buildout, irrigation for the Specific Plan may require approximately 100,000 gallons of water per day. The package wastewater treatment plant will provide

48,000 gallons per day at maximum occupancy. During periods of low occupancy, between 52,000 and 100,000 gallons per day of groundwater may be required for irrigation purposes. The potential for impacts to groundwater and water quality will be analyzed in the Program EIR, as well and the issue of effluent use and/or disposal from the package wastewater treatment plant.

Air Quality - The potential for the package wastewater treatment plant to impact air quality due to odors will be analyzed in the Program EIR.

<u>Transportation/Circulation</u> - A traffic study is being revised for the proposed Specific Plan. Development of the Specific Plan would generate 164 on-season average daily traffic (ADT) and 376 off-season ADT. The traffic study analyzes the potential project generated and build-out impacts to Highway 67, Mussey Grade Road and the intersection of Highway 67/Mussey Grade Road.

<u>Biological Resources</u> - A biological survey report is being revised for the Salvation Army property. Issues specific to the project include potential impacts to Oak woodlands, wetlands, Diegan coastal sage scrub, Chaparral scrub, and Southern mixed chaparral. Mitigation measures will be implemented for project impacts consistent with the County Biological Mitigation Ordinance.

<u>Hazards</u> - The Salvation Army property is located in a rural setting and largely covered with highly flammable native and non-native vegetation. The fire hazard rating for the property is high; a wildfire occurred within the property in 1995. In addition, the package wastewater treatment plant would be a source for the potential release of contaminants or potential toxins, as well as posing additional risks to public safety through the transportation, storage and use of hazardous materials necessary for the treatment of wastewater to Title 22 standards. The potential for impacts to human health/public safety associated with fire safety and the package wastewater treatment plant will be analyzed in the Program EIR.

Noise - A noise study is being revised for the proposed Specific Plan. The noise study analyzes the potential for noise from existing and projected traffic volumes on Mussey Grade Road to impact proposed on-site uses, as well as noise from traffic, construction and project development to impact surrounding uses. Mitigation measures for noise sensitive receptors that would have the potential to be impacted are identified and will be implemented.

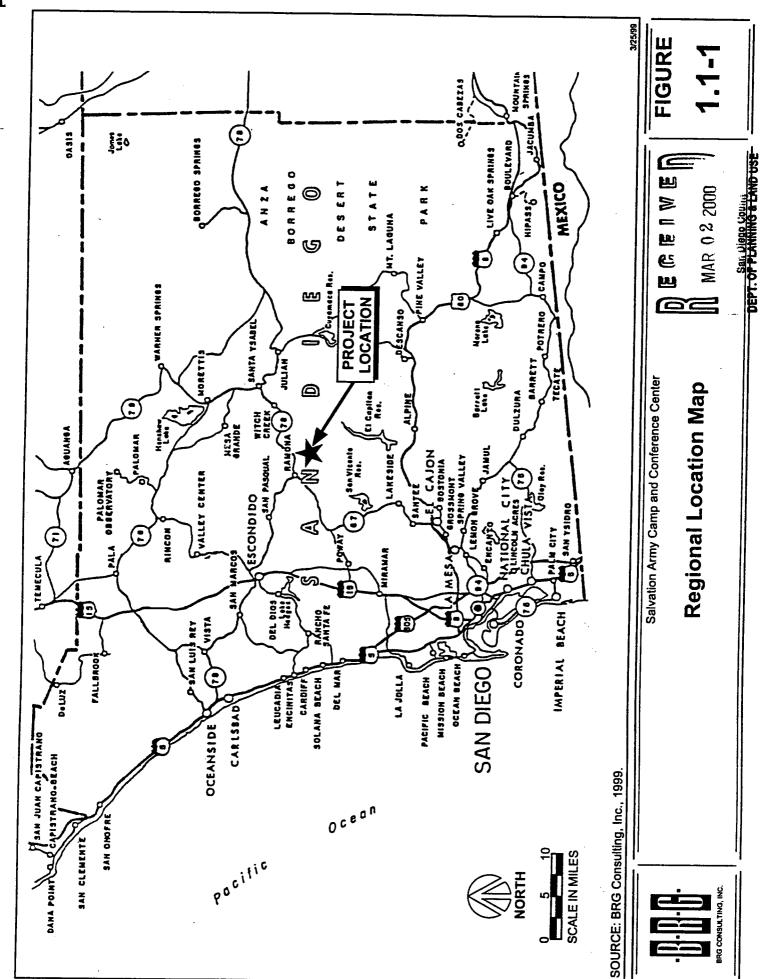
<u>Utilities and Services</u> - The Specific Plan proposes to handle expanded sewage requirements with an on-site package wastewater treatment plant. However, urban-type growth outside of designated urban areas has been restricted by County policy (Board Policy I-78) with regards to the location of small wastewater treatment plants (package wastewater treatment plants). Unless an exception is made to this policy by the Board of Supervisors, package wastewater treatment plants cannot be

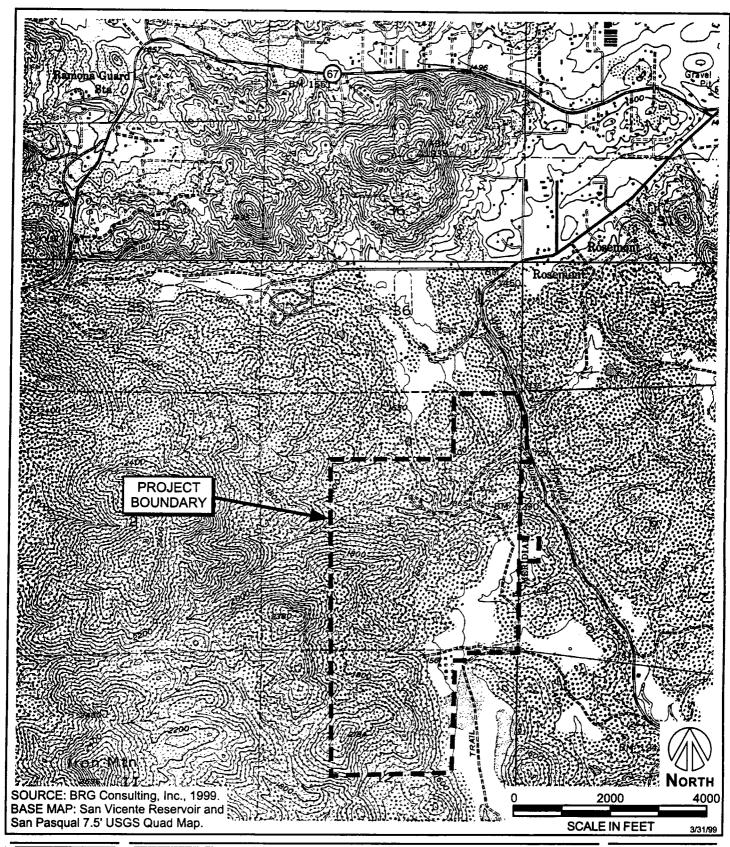
used on the property due to its distance from the urban limit line of the unincorporated community of Ramona. The Ramona Municipal Water District, which holds the latent sewer power over the site, is on record as discouraging the use of package wastewater treatment plants. Additionally, the Ramona Community Plan also specifically discourages the use of package wastewater treatment plants. The Program EIR will analyze the potential for adverse impacts on utilities and services associated with a package wastewater treatment plant.

<u>Aesthetics/Landform Modification</u> - A visual impact study is being revised for the proposed project. The study analyzes the potential visual impacts that would result from tree and vegetation removal, alteration of landforms, and the addition of buildings and structures, as well as the project's compatibility with the *Ramona Community Plan* and the *Ramona Design Guidelines*. Particular emphasis is placed on the potential impacts of removing oak trees and sensitive biological habitat, grading and views from Mussey Grade Road, Dos Picos County Park and surrounding residences. Significant grading impacts will be mitigated.

<u>Cultural Resources</u> - A cultural resources survey has been completed for the proposed Specific Plan, resulting in the identification of five prehistoric archaeological sites. A testing program will be carried out to evaluate the significance of those resources that would be potentially impacted. The cultural resources report will analyze the potential impacts of the project on prehistoric sites and identify mitigation measures, if appropriate.

ND0300\9814023-SP;jcr







Salvation Army Camp and Conference Center

Project Location Map

FIGURE

1.1-2



GARY L. PRYOR DIRECTOR (858) 694-2962

County of San Diego

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March 14, 2000

TO:

Distribution List

FROM:

County of San Diego

Department of Planning and Land Use

5201 Ruffin Road, Suite B San Diego, California 92123

RE:

NOTICE OF INTENT TO PREPARE A DRAFT PROGRAM

ENVIRONMENTAL IMPACT REPORT

The County of San Diego will be the lead agency and will prepare a Program Environmental Impact Report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the Program Environmental Impact Report prepared by our agency when considering your permit or other approval for the project.

The Initial Study and Environmental Analysis Form for the project are attached and these materials contain a detailed project description, location, and a discussion of the probable environmental effects, and a discussion about effects that have been determined to be less than significant.

PLEASE SEND YOUR RESPONSE TO GLENN S. RUSSELL AT THE ADDRESS SHOWN ABOVE. WE WILL NEED THE NAME OF A CONTACT PERSON IN YOUR AGENCY. WE WILL NEED YOUR COMMENTS NO LATER THAN 4:00 P.M. ON FRIDAY, APRIL 14, 2000 . PLEASE REFERENCE THE PROJECT NUMBER WITH YOUR COMMENTS.

PROJECT TITLE: SALVATION ARMY DIVISIONAL CAMP AND RETREAT SPECIFIC PLAN; P70-379W², LOG NO. 98-14-023

PROJECT APPLICANT: The Salvation Army

DATE: March 16, 2000

SIGNATURE:

TITLE: <u>EMS</u>

ND0300\9814023-NOI;jcr

GARY L. PRYOR DIRECTOR (858) 694-2962



338 VIA VERA CRUZ - SUITE 201 SAN MARCOS, CA 92069-2620 (760) 471-0730 EL CAJON OFFICE

SAN MARCOS OFFICE

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DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666 INFORMATION (858) 694-2960 TOLL FREE (800) 411-0017

February 29, 2000

INITIAL STUDY FORM

Project Number(s)/Environmental Log Number/Title:

P70-379W², Log No. 98-14-023; Salvation Army Divisional Camp and Retreat Specific Plan

2. Description of Project:

The proposed project is a major modification of a Major Use Permit P70-379W¹ and a Specific Plan. The project is a proposal for a 20 year master plan to expand an existing 575 acre camp and retreat for the Salvation Army. Zoning Ordinance Section 2705 requires a Major Use Permit for this use in an A70 Zone. The phased 20 year master plan proposes tent camping, nature studies camping, and conferencing for a maximum capacity of 850 people. The proposed Specific Plan for the 20 year phased expansion of the Salvation Army Divisional Camp and Retreat would include the following major components:

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the site and construct five, two-story motel style buildings to accommodate guests; a building with a flexible meeting room, kitchen and breakout space; and two tennis courts, a swimming pool and a shower/toilet/spa building. Maximum capacity for this component would be 175 guests.

<u>Expanded Remote Over-night Camp Areas</u>. The proposed Specific Plan would increase the one existing hike-in camp area to a total of three, with fire rings, brush clearance within 50 feet of the rings and a 50-gallon water basin at each camp area. These camp areas would be intended for over-night visits by 8-10 individuals home-based at either the Cabin Camp or Tent Camp.

Recreational Vehicle Parking Area. This new component would include 15 spaces on approximately 1.5 acres and a dump station for visitors with recreational vehicles to stay overnight. Maximum capacity for this component would be 30 users.

Expanded Support Facilities. The proposed Specific Plan would also include: a 24,000-square-foot central dining facility to serve the Cabin Camping, Tent Camping and Nature Study/Educational Camp components; a 21,000-squarefoot multi-purpose building to service the Cabin Camping, Tent Camping and Nature Study/Educational Camp components; a 2,000-square-foot mini-theater adiacent to the multi-purpose building; a 3,500-square-foot central administrative cluster to house administrative offices, a small infirmary and small convenience store (existing Ranch House and Clinic that house these function would be converted to staff support uses); four 500-square-foot arts and crafts ramadas; a 3,600-square-foot maintenance building and 1,200square-foot supply building (existing maintenance facilities would be demolished); recreation areas, including tennis and basketball courts, a large swimming pool and 2,500-square-foot bathhouse, and existing open play fields; 31,500 square feet of staff housing for a maximum of 64 staff (including conversion of the five existing Lodge Cabins to staff housing); 188 parking spaces; a package wastewater treatment plant; and an eight-inch water line (replacing existing six-inch water line) under Mussey Grade Road and the existing site Access roads from Highway 67 to the camp site.

3. Project Sponsor's Name and Address:

The Salvation Army 825 Seventy Avenue San Diego, CA 92101

4. Project Location:

The Salvation Army property is located at 14488 Mussey Grade Road in the Ramona Community Planning Area, in central San Diego County. The 575-acre property is situated on the western side of Mussey Grade Road, south of Highway 67 and north of the San Vicente Reservoir (portions of Section 6, Township 14 South, Range 1 West; and Sections 1 and 12, Township 14 South, Range 1 East; San Vicente Reservoir 7.5-Minute USGS Quadrangle, San Bernardino Base Meridian).

Thomas Brothers Coordinates: Page 1171, Grid H/6 & 7 and J/6 & 7 1191, Grid H/1 & 2 and J/1 & 2

5. Surrounding Land Uses and Environmental Setting:

The Salvation Army property is surrounded by predominately low density rural single-family housing and open space to the north, south and east. Most of this land is designated Rural Residential and Estate Residential and is zoned A-70, Limited Agriculture, with minimum lots ranging from two to eight acres in size. North of the property is the Golden Eagle West Ranch and large lot residences north of Dos Picos Park Road. To the east and adjacent to the site are existing homes. To the west of the site are rugged, mountainous terrain and the eastern municipal boundary of the City of Poway. The surrounding vegetation is predominately native habitat, including Diegan coastal sage scrub, chaparral and oak woodlands, as well as non-native grasslands. The main north-south access in the area is provided by Highway 67, Mussey Grade Road and Wildcat Canyon Road. Very few improved east-west roads exist. Many of the existing homes in the area have private roads with restricted access. Northeast of the site is the Santa Maria Valley and the town of Ramona, located in a low-lying area surrounded by mountainous and rugged terrain.

The topography of the project site is primarily mountainous, with steep slopes on the western portion of the property covered with chaparral. Currently, there are several hiking trails, a mounted cross and one remote camping site in this rugged mountainous terrain. A small portion of the property consists of a meadow and gently rolling hills that support Diegan coastal sage scrub, chaparral scrub, oak woodlands, oak riparian forest, and non-native grasslands. The eastern portion of the site contains relatively level, disturbed land where the existing camping facility has been developed. The existing camping facility is located in the southeast portion of the property and generally includes a ranch house, cabins, conference building, overnight tent camping location, pool and bath house, and maintenance area. The maximum overnight population of the existing camp is currently 196 persons. The

Date:

existing camp has a backbone infrastructure system that consists of a system of traditional wooden "T" power poles with 12 Kilovolt lines, a 10,000 gallon water tank and pump, a septic sewer system, and network of dirt and gravel roads.

6. General Plan Designation

Community Plan:

Ramona

Land Use Designation:

Multiple Rural Use (18)

Density:

Density:

du/

acre(s)

acre(s)

7. Zoning

Use Regulation:

A-70, Limited Agriculture

du/

Special Area Regulation:

8. Environmental resources either significantly affected or significantly affected but avoidable as detailed on the following attached "Environmental Analysis Form".

Land Use and Planning (includes Community Character)

Geological Issues

Water Resources

Biological Resources

Hazards

Noise

Utilities and Services

Aesthetics (includes Landform Modification)

Mandatory Findings of Significance

9. Lead Agency Name and Address:

County of San Diego, Department of Planning and Land Use 5201 Ruffin Road, Suite B MS 0650 San Diego, California 92123-1666

10. Lead Agency Contact and Phone Number:

Glenn S. Russell, (858) 694-2981

11. Anticipated discretionary actions and the public agencies whose discretionary approval is necessary to implement the proposed:

Initial Study, - 5 -Date:

Permit Type/Action

Site Plan Clearing and Grading Permit

Habitat Loss Permit

Streambed Alteration Agreement Endangered Species Act - Section 7

or 10a

Clean Water Act - Section 404 Permit

Clean Water Act - Section 401

Certification

Annexation to Ramona Municipal

Water District (RMWD)

Package Wastewater Treatment Plant County of San Diego Sanitation District **Design & Treatment Guidelines**

National Pollution Discharge **Elimination System Permit**

Air Quality Permit

Agency

County of San Diego County of San Diego County of San Diego

Calif. Dept. of Fish and Game (CDFG) U.S. Fish and Wildlife Service (USFWS)

U.S. Army Corps of Engineers San Diego Regional Water Quality Control Board (SDRWQCB)

Local Agency Formation Commission

(LAFCo) and RMWD

and SDRWQCB **SDRWQCB**

Air Pollution Control District (APCD)

12. State agencies (not included in #11) that have jurisdiction by law over <u>natural</u> resources affected by the project:

Not applicable

13. Participants in the preparation of this Initial Study:

County Department of Planning and Land Use:

Bob Goralka Tiffany Mueller Rosalind Smith Glenn Russell Rick Tavares

ASM Affiliates BRG Consulting Gordon Bricken & Associates Linscott Law & Greenspan Matalon Architecture & Planning Merkel & Associates

14. **Initial Study Determination:**

On the basis of this Initial Study, the Department of Planning and Land Use believes that there is no evidence in the record that the proposed project may have a potentially significant effect on the environment. A NEGATIVE DECLARATION will be prepared.

On the basis of this Initial Study, the Department of Planning and Land Use believes that the proposed project may have a potentially significant effect on the environment. However, the mitigation measures described in the attached Environmental Analysis Form have been added to the project which clearly reduce the potentially significant effects to a level below significance. A MITIGATED NEGATIVE DECLARATION will be prepared.

On the basis of this Initial Study, the Department of Planning and Land Use believes the following: there are no new significant environmental effects and no substantial increase in severity of effects identified in an earlier Negative Declaration for the proposed project or property are present as the result of either 1) changes in the project; 2) changes in circumstances under which the project is undertaken; or 3) new information which could not have been known without the exercise of reasonable diligence at the time the previous Negative Declaration was adopted. Therefore, the previously adopted NEGATIVE DECLARATION is adequate without modification.

On the basis of this Initial Study, the Department of Planning and Land Use believes the following: there are no new significant environmental effects and no substantial increase in severity of effects identified in an earlier Negative Declaration for the proposed project or property are present as the result of either 1) changes in the project; 2) changes in circumstances under which the project is undertaken; or 3) new information which could not have been known without the exercise of reasonable diligence at the time the previous Negative Declaration was adopted. Therefore, the previously adopted NEGATIVE DECLARATION will be considered adequate upon completion of an ADDENDUM to reflect minor technical changes.

On the **basis** of this Initial Study, the Department of Planning and Land Use believes the following: there are no new significant environmental effects and no substantial increase in severity of effects identified in an earlier Negative Declaration for the proposed project or property are present as the result of either 1) changes in the project; 2) changes in circumstances under which the project is undertaken; or 3) new information which could not have been known without the exercise of reasonable diligence at the time the previous Negative Declaration was adopted. However, since more than minor technical changes are necessary, a SUBSEQUENT NEGATIVE DECLARATION is required.

On the basis of this Initial Study, the Department of Planning and Land Use believes that the proposed project MAY have a potentially significant effect on the environment. An ENVIRONMENTAL IMPACT REPORT is required.

On the basis of this Initial Study, the Department of Planning and Land Use believes the following: there are no new significant environmental effects and no substantial increase in severity of effects identified in an earlier Environmental Impact Report for the proposed project or property are present as the result of either 1) changes in the project; 2) changes in circumstances under which the project is undertaken; or 3) new information which could not have been known without the exercise of reasonable diligence at the time the previous Environmental Impact Report was adopted. Therefore, since no changes are necessary, the previously adopted ENVIRONMENTAL IMPACT REPORT is adequate without modification.

On the basis of this Initial Study, the Department of Planning and Land Use believes the following: there are no new significant environmental effects and no substantial increase in severity of effects identified in an earlier Environmental Impact Report for the proposed project or property are present as the result of either 1) changes in the project; 2) changes in circumstances under which the project is undertaken; or 3) new information which could not have been known without the exercise of reasonable diligence at the time the previous Environmental Impact Report was adopted. Therefore, the previously adopted ENVIRONMENTAL IMPACT REPORT will be considered adequate upon completion of an ADDENDUM to reflect minor technical changes.

On the basis of this Initial Study, the Department of Planning and Land Use believes the following: new significant environmental effects or an substantial increase in severity of effects identified in an earlier Negative Declaration or Environmental Impact Report for the proposed project or property are present as the result of either 1) changes in the project; 2) changes in circumstances under which the project is undertaken; or 3) new information which could not have been known without the exercise of reasonable diligence at the time the original earlier Negative Declaration or Environmental Impact Report was adopted. Therefore, a SUBSEQUENT/SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT is required.

Glenn S. Russell, Environmental Analyst Date: February 29, 2000 County of San Diego, Department of Planning and Land Use Resource Planning

ENVIRONMENTAL ANALYSIS FORM

DATE:

February 29, 2000

PROJECT NAME: Salvation Army Divisional Camp and Retreat Specific Plan

PROJECT NUMBER(S): MUP70-379W2

EXPLANATION OF ANSWERS:

The following questions are answered either "Potentially Significant Impact", "Potentially Significant Unless Mitigation Incorporated", "Less Than Significant Impact", or "Not Applicable" and are defined as follows.

"Potentially Significant Impact." County staff is of the opinion there is substantial evidence that the project has a potentially significant environmental effect and the effect is not clearly avoidable with mitigation measures or feasible project changes. "Potentially Significant Impact" means that County staff recommends the preparation of an Environmental Impact Report (EIR) for the project.

"Potentially Significant Unless Mitigation Incorporated." County staff is of the opinion there is substantial evidence that the project may have a potentially significant adverse effect on the resource. However, the incorporation of mitigation measures or project changes agreed to by the applicant has clearly reduced the effect to a less than significant level.

"Less Than Significant Impact." County staff is of the opinion that the project may have an effect on the resource, but there is no substantial evidence that the effect is potentially significant and/or adverse.

"Not Applicable." County staff is of the opinion that, as a result of the nature of the project or the existing environment, there is no potential for the proposed project to have an effect on the resource.

I. LAND USE AND PLANNING

1. Would the proposal potentially be in conflict with any element of the General Plan including community plans, land use designation, or zonina?

Potentially Significant Impact.

The Salvation Army Divisional Camp and Retreat Specific Plan is consistent with the General Plan, Ramona Community Plan, Ramona

Design Guidelines, Multiple Rural Use (18) designation, and A-70 (Limited Agriculture) zone. The Specific Plan proposes to expand an existing community use that provides substantial benefit to the community. The Specific Plan would change the density of the site from an existing overnight population of 196 persons to a build-out population of 789 persons, with supporting facilities. The proposed development would be phased in over a 20-year period. The project is designed with low-scale, one- and two-story structures (10 to 35 feet in height) that will be clustered in five general areas to minimize building massing, landform alteration and vegetation removal. Encroachment into steep hillside will be minimized by clustering development in existing flat areas of the property and stepping larger structures to follow the natural contour of the land. Substantial open space has also been worked into the site plan to minimize disruption to the natural form of the terrain, and to minimize building massing. The design treatment of the proposed buildings would be rustic in character, built with wood, brick or masonry, and finished with exterior earth-tone colors. In addition, the project includes a landscape concept plan that would be implemented for all development phases as part of this project. The landscape concept plan includes substantial landscaping to soften and screen proposed buildings with native drought tolerant species that match the existing onsite vegetation. These project features preserve the rural character of the area and the Community Plan.

However, urban-type growth outside of designated urban areas has been restricted by County policy (Boards Policy I-78) with regards to the location of small wastewater treatment plants. Unless an exception is made to this policy by the Board of Supervisors, package wastewater treatment plants cannot be used on the property due to its distance from the urban limit line of the unincorporated community of Ramona. The Ramona Municipal Water District, which holds the latent sewer power over the site, is on record as discouraging the use of package wastewater treatment plants (LAFCo, 1990). Additionally, the Ramona Community Plan also specifically discourages the use of package wastewater treatment plants. To date, one exception in Valley Center has been granted to this policy.

2. Would the proposal potentially be in conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project?

Potentially Significant Unless Mitigation Incorporated.

Encroachment into steep hillside would be minimized by clustering development in existing flat areas of the property and stepping larger structures to follow the natural contour of the land. Potentially significant grading impacts will be mitigated to below a level of significance. Potentially significant impacts to biological resources, as identified in the biological survey report, including wetlands, oak woodlands, Diegan coastal sage scrub, and chaparral scrub, will be mitigated consistent with the County Biological Mitigation Ordinance. Potentially significant impacts to cultural resources are not anticipated in the cultural resources survey report. If, as a result of testing, significant impacts are identified, they will be avoided through project redesign.

3. Does the proposal have the potential to be incompatible with existing or planned land uses or the character of the community?

Less Than Significant Impact.

The Specific Plan is compatible with existing and planned land uses. The Specific Plan proposes to expand an existing community use that provides substantial benefit to the community. The project is designed with low-scale, one- and two-story structures (10 to 35 feet in height) that will be clustered in five general areas to minimize building massing, landform alteration and vegetation removal. Encroachment into steep hillside will be minimized by clustering development in existing flat areas of the property and stepping larger structures to follow the natural contour of the land. Substantial open space has also been worked into the site plan to minimize disruption to the natural form of the terrain, and to minimize building massing. The design treatment of the proposed buildings will be rustic in character, built with wood, brick or masonry, and finished with exterior earth-tone colors. In addition, the project includes a landscape concept plan that will be implemented for all development phases as part of this project. The landscape concept plan includes substantial landscaping to soften and screen proposed buildings with native drought tolerant species that match the existing onsite vegetation. These project features preserve the rural character of the area and the Community Plan.

4. Would the proposal have a potentially significant adverse effect on agricultural resources or operation?

Less Than Significant Impact.

The proposed project is not in prime agricultural soils, as identified on the soils map for the Conservation Element of the San Diego County General Plan. The proposed project site does not support any agricultural resources or operations, nor have any agricultural resources or operations been identified in the immediate vicinity.

5. Would the proposal have the potential to significantly disrupt or divide the physical arrangement of an established community?

Less Than Significant Impact.

The Specific Plan will expand the existing Salvation Army Divisional Camp and Retreat over a 20-year period. The operational characteristics of the expanded facility will not result in significant impacts to the surrounding community, because they will be similar to the existing activities.

II. POPULATION AND HOUSING

1. Would the proposal potentially induce substantial growth either directly or indirectly?

Less Than Significant Impact.

The project does not involve substantial extensions of utilities such as water, sewer or new roads systems into previously unserved areas and is consistent with the County General Plan. The project will, however, replace the existing six-inch water line under Mussey Grade Road and the existing site access roads from Highway 67 to the property with an eight-inch water line to achieve fire-flow requirements. The project will not induce substantial growth not consistent with County planning goals.

2. Would the proposal displace a potentially significant amount of existing housing, especially affordable housing?

Not Applicable.

The Specific Plan proposes to expand an existing community use that provides substantial benefit to the community. The Specific Plan would change the density of the site from an existing overnight population of 196 persons to a build-out population of 789 persons, with supporting facilities.

III. GEOLOGIC ISSUES

1. Would the proposal have the potential to significantly increase the exposure of people to hazards related to fault rupture (Alquist-Priolo Zone), seismic ground shaking, seismic ground failure (liquefaction), rockfall, or landslides?

Potentially Significant Unless Mitigation Incorporated.

The project is not located in a hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1994, Fault-Rupture Hazards Zones in California. However, because the soils on the property tend to be highly erosive and occur on slopes of 25 percent or greater, the site would be at a greater risk to landslides and rockslides during seismic events. Appropriate geotechnical studies will be completed prior to issuance of building permits.

2. Would the proposal result in potentially significant increased erosion?

Potentially Significant Unless Mitigation Incorporated.

According to the Soil Survey of San Diego County, the soils on-site are identified as Cienaba-Fallbrook Association, Very Rocky, and Friant-Escondido, Eroded. These soils tend to be highly erosive. In addition, the access road to the proposed conference center will cross a "blue line" drainage and require grading of steep slopes. Grading for the access road will result in a 35-foot cut slope. A geologic reconnaissance, wetland delineation, hydrologic study, and steep slopes analysis will be required to identify project specific mitigation.

3. Would the proposal result in potentially significant unstable soil conditions (expansive soils) from excavation, grading, or fill?

Less Than Significant Impact.

A review of the Soil Survey, San Diego Area CA by the U.S. Department of Agriculture has identified no soils on the site which have a HIGH shrinkswell behavior. All mapped soils on the site have a low to moderate shrink-swell behavior. Therefore, on-site soil conditions are stable and do not have adverse potential for development activity.

4. Would the proposal result in a potentially significant adverse effect to unique geologic features?

Less Than Significant Impact.

According to the Ramona Community Plan, Iron Mountain is an important geologic resource or landmark that occurs within the property. The Specific Plan, however, will avoid the slopes of Iron Mountain and, therefore, will not have an adverse effect.

5. Would the proposal result in potentially significant loss of availability of a significant mineral resource that would be of future value to the region?

Less Than Significant Impact.

The project will not result in a loss of availability of a known significant mineral resource that would be of value to the region. The project is not located in a significant mineral resource area, as identified on maps prepared by the Department of Conservation, Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1996). Also, based on a site visit conducted by Glenn Russell on ,no past or present mining activities were identified on the project.

IV. WATER RESOURCES

1. Would the proposal create a potentially adverse effect on drainage patterns or the rate and amount of runoff?

Less Than Significant Impact.

The access road to the proposed conference center will cross a "blue line" drainage. The biological survey report will include a wetland delineation. The drainage crossing will be designed to avoid adverse effects on drainage (i.e., to not impede the flood capacity or obstruct the floor of the drainage); therefore there will be no effect on drainage.

2. Would the proposal result in a potentially significant increase in the demand on the local imported water system?

Less Than Significant Impact.

The project's demand on the local imported water system will be limited to potable water. Irrigation needs will be met by means of the package wastewater treatment plant and groundwater. A Service Availability Letter from the local water district has been provided indicating adequate water

resources and infrastructure to provide requested water resources. The project will, however, replace the existing six-inch water line under Mussey Grade Road and the existing site access roads from Highway 67 to the property with an eight-inch water line to achieve fire-flow requirements.

3. Would the proposal have a potentially significant adverse effect on surface water quality?

Potentially Significant Unless Mitigation Incorporated.

The proposed property includes several ephemeral and intermittent drainages. A package wastewater treatment plant has the potential to impact the quality of surface waters through the inadvertent release of contaminants (i.e., undertreated effluent or hazardous chemicals). In addition, run-off from roadways, paved parking areas and developed portions of the site has the potential to degrade water quality. The potential for significant impacts to surface water quality will be reduced to below a level of significance through implementation of best management practices (BMPs). Prior to construction/grading of the site, a Notice of Intent (NOI) must be filed with the State Water Resources Control Board (SWRCB) for a General Construction Storm Water Permit. Once construction is complete, the site owner and/or facility operator is required to investigate coverage under the General Industrial Storm Water Permit by contacting the SDRWQCB at (619) 467-2952. In addition, if future uses allowed under the General Impact Industrial Use Regulations (M54) involve contaminates and/or the planned discharge of waste to waters of the State or ground/soil, a permit may be required by the SDRWQCB..

4. If the proposal is groundwater dependent, plans to utilize groundwater for non-potable purposes, or will obtain water from a groundwater dependent water district, does the project have a potentially significant adverse effect on groundwater quantity?

Potentially Significant.

The Salvation Army Divisional Camp and Retreat proposes to use groundwater for irrigation. At build-out, irrigation for the Specific Plan may require up to 100,000 gallons of water per day. The proposed package wastewater treatment plant will provide approximately 48,000 gallons of treated water per day at maximum occupancy. During periods of low occupancy, however, between 52,000 and 100,000 gallons of groundwater per day may be required for irrigation purposes. The need

for a ground water study will be coordinated with John Peterson, County groundwater geologist.

5. Would the project have a potentially significant adverse effect on groundwater quality?

Potentially Significant Unless Mitigation Incorporated.

A package wastewater treatment plant has the potential to impact the quality of groundwater through the inadvertent release of contaminants (i.e., undertreated effluent or hazardous chemicals). The potential for significant impacts to groundwater quality will be reduced to below a level of significance through implementation of best management practices (BMPs). Prior to construction/grading of the site, the owner and/or facility operator is required to investigate coverage under the General Dewatering Permit by contacting the SDRWQCB at (619) 467-2952. In addition, if future uses allowed under the General Impact Industrial Use Regulations (M54) involve contaminates and/or the planned discharge of waste to waters of the State or ground/soil, a permit may be required by the SDRWQCB.

V. AIR QUALITY

1. Would the proposal have the potential to significantly contribute to the violation of any air quality standard or significantly contribute to an existing or projected air quality violation?

Less Than Significant Impact.

No significant source of either stationary or indirect air pollutants has been identified from the project. The primary source of air pollutants would be generated from vehicle trips associated with the proposed project. The vehicle trips generated from the project will result in 376 Average Daily Traffic (ADTs). According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 ADT are below the threshold of significance for reactive organic gases (ROG). Therefore, the vehicle trip emissions associated with the proposed project are not expected to significantly contribute to an existing or projected air quality violation. No other potential sources of air pollutants have been identified from the project. Additionally, the project is not expected to emit any toxic air contaminant or particulate matter based on project description and information submitted.

The Specific Plan will not result in significant impacts to traffic safety.

3. Would the proposal potentially result in insufficient parking capacity on-site or off-site?

Less Than Significant Impact.

Based on the traffic study prepared by Linscott Law & Greenspan (May 1999), development of the Specific Plan will require 188 permanent parking spaces. A total of 188 permanent spaces will be provided; therefore, on-site parking capacity will be sufficient. Special events will be rare, and overflow parking will be provided.

4. Would the proposal result in a potentially significant hazard or barrier for pedestrians or bicyclists?

Less Than Significant Impact.

Mussey Grade Road is designated in the County's Bicycle Element to have a bike lane. The addition of 376 ADT at build-out will not result in a significant hazard for pedestrians or bicyclists.

VII. BIOLOGICAL RESOURCES

1. Would the proposal result in potentially significant adverse effects, including noise from construction or the project, to an endangered, threatened, or rare plant or animal species or their habitats?

Potentially Significant Unless Mitigation Incorporated.

Based on the biological survey report prepared by Merkel & Associates, Inc. (June 1999), the site contains oak woodlands, wetlands (oak riparian forest), Diegan coastal sage scrub, chaparral scrub, and southern mixed chaparral, which if disturbed would result in a significant impact. Mitigation measures will be implemented for project impacts consistent with the County Biological Mitigation Ordinance. The best conservation/mitigation opportunities on the Salvation Army property occur contiguous to the site boundaries through the northern, southern and western portions of the site. These areas include most of the oak riparian forest, southern mixed chaparral and the area burned in the 1995 fire. Opportunities for off-site mitigation should also be available in the San Vicente Conservation bank (an MSCP Pre-approved Mitigation

Area), which abuts the southwestern corner of the Specific Plan boundary.

2. Does the project comply with the Sensitive Habitat Lands section (Article IV, Item 6) of the Resource Protection Ordinance?

Yes.

The Specific Plan would impact environmentally sensitive land protected under the RPO. For impacts to sensitive habitat lands, the RPO has a no net-loss policy and requires that all feasible mitigation measures be incorporated into the project before earthwork can begin. The proposed project has been designed to avoid or minimize impacts to sensitive habitat encroachment into hillside areas, and will mitigate impacts to biological resources in accordance with the County's MSCP Subarea Plan ratios for biological core areas to replace the lost functions and value of the impacted habitat. Therefore, the project would be consistent with the RPO.

3. Would the proposal result in potentially significant adverse effects to wetland habitats or wetland buffers? Is the project in conformance with wetland and wetland buffer regulations within the Resource Protection Ordinance?

Potentially Significant Impact.

The site contains oak riparian forest, which if disturbed would result in a significant impact. The access road to the proposed conference center will cross a "blue line" drainage supporting oak riparian forest habitat. The biological survey report will include a wetland delineation. The drainage crossing will be designed to avoid adverse impacts on wetlands to the extent feasible.

4. Would the proposal result in potentially significant adverse effects to wildlife dispersal corridors?

Less Than Significant Impact.

Although drainage and topographic features that appear to be appropriate wildlife dispersal or migration corridors occur on-site, no regional wildlife corridor has been identified on-site. The oak riparian forest on the northeast edge of the site, and adjacent to Mussey Grade Road off-site is expected to act as a biological corridor. This corridor allows passage through agricultural areas north of the site and

continues into less disturbed habitats to the south. The proposed Specific Plan will not impact this movement corridor. Therefore no significant impact will occur.

5. Does the proposed project conform to the Multiple Species Conservation Program and Biological Mitigation Ordinance?

Yes.

The project site is located within the Central Poway/San Vicente Reservoir/North Poway Core Resource area of the County's MSCP Subarea Plan. Sensitive habitat targeted for protection under the MSCP have been identified throughout the property, and include Coast live oak habitat (Tier I), Diegan coastal sage scrub and chaparral scrub (Tier II), and southern mixed chaparral (Tier III). Because the project has been designed to avoid or minimize impacts to Tier I and II habitats, to minimize encroachment into Tier III habitats, and to mitigate in accordance with the MSCP Subarea Plan ratios for biological core areas, the project would not result in habitat fragmentation or reduce the width of any linkage area. Impacts to covered habitats will be mitigated in accordance with the County's Subarea Plan and Biological Mitigation Ordinance. Therefore, the project would not preclude attainment of the habitat or species conservation goals set out in the Metro-Lakeside-Jamul Segment and impacts would not be significant.

6. Does the proposed project conform to the Habitat Loss Permit/Coastal Sage Scrub Ordinance findings?

Not Applicable.

The proposed project and any off-site improvements are located within the boundaries of the Multiple Species Conservation Program.

Therefore, conformance to the Habitat Loss Permit/Coastal Sage Scrub Ordinance findings is not required.

VIII. HAZARDS

1. Would the proposal present a significant risk of accidental explosion or release of hazardous substances?

Less Than Significant Impact.

The proposed project will contain, handle, or store potential sources of chemicals or compounds associated with the package wastewater

treatment plant that would present a significant risk of release of contaminants, potential toxins or hazardous materials necessary for the treatment of wastewater to Title 22 standards. Therefore, the following Department of Environmental Health, Land and Water Quality Division conditions must be met: prior to use and reliance of the Major Use Permit (MUP): all storage, handling, and disposal of potentially toxic substances shall be handled in full compliance with local, State, and Federal regulations. This will require permits from or consultation made with the following agencies: County of San Diego Department of Heath Services, County of San Diego Sanitation District, Air Pollution Control District, and San Diego Regional Water Quality Control Board.

2. Would the proposal have the potential to significantly interfere with the County of San Diego Operational Area Emergency Plan or the County of San Diego Operational Site Specific Dam Failure Evacuation Data Plans?

Less Than Significant Impact.

The project lies outside any mapped dam inundation area for major dams/reservoirs within San Diego County, as identified on inundation maps prepared by the dam owners. Thus, the project complies with all applicable plans as established by the County Office of Disaster Preparedness.

3. Would the proposal have the potential to significantly increase the fire hazard in areas with flammable vegetation?

Potentially Significant Impact.

The Salvation Army property is located in a rural setting and largely covered with highly flammable native and non-native vegetation. The fire hazard rating for the property is high; a wildfire occurred within the property in 1995.

4. a. Would the proposal expose people or property to flooding?

Less Than Significant Impact.

The Specific Plan does not propose development within a floodway or floodplain or changing the configuration of the floodway or floodplain of a stream channel.

b. Does the project comply with the Floodways and Floodplain Fringe section (Article IV, Section 3) of the Resource Protection Ordinance?

Not Applicable.

The Specific Plan does not propose development within a floodway or floodplain or changing the configuration of the floodway or floodplain of a stream channel.

5. Would the proposal expose people to any other demonstrable potentially significant health or safety hazard not listed above?

Less Than Significant Impact.

No other health or safety hazard has been identified in the review of the proposed project.

IX. NOISE

1. Would the proposal result in exposing people to potentially significant noise levels (i.e., in excess of the San Diego County Noise Control Regulations)?

Less Than Significant Impact.

The proposal would not expose people to potentially significant noise levels which exceed the allowable limits of the County of San Diego Noise Element of the General Plan, County of San Diego Noise Ordinance, and other applicable local, State, and Federal noise control regulations.

Transportation (traffic, railroad, aircraft) noise levels at the project site are not expected to exceed Community Noise Equivalent Level (CNEL)=60 decibels (dB) limit.

Noise impacts to the proposed project from adjacent land uses are not expected to exceed the property line sound level limits of the County of San Diego Noise Ordinance.

2. Would the proposal generate potentially significant adverse noise levels (i.e., in excess of the San Diego County Noise Control Regulations)?

Potentially Significant Unless Mitigation Incorporated.

Even though the proposal could generate potentially significant noise levels (i.e., in excess of the County General Plan or Noise Ordinance), the following noise mitigation measures are proposed to reduce the noise impacts to applicable limits:

- Project related development capable of producing noise levels in excess of the County standards shall be required to provide a site-specific noise analysis demonstrating compliance with County Noise regulations. This includes any development located within 200 feet of Mussey Grade Road. This study shall be completed prior to issuance of building permits for the proposed construction phase.
- 2. The use of sound amplification equipment shall be limited to the designated amphitheater areas and shall be designed to not exceed the applicable fixed source property line standards. No other outside paging or amplification system shall be allowed. No amplification equipment shall be operated outside between the hours of 10 p.m. to 7 a.m.
- 3. All proposed recreational use shall be subject to compliance with applicable noise standards. This will include any off-highway or model aircraft uses.
- 4. Property maintenance shall be performed between the hours identified in the County's Noise Ordinance. Powered outdoor equipment producing excessive noise levels shall not be allowed except by special permit.
- 5. Outdoor noise producing events (except for youth bands and sporting activities) will require a special permit to operate. No use shall be approved between the hours of 10 p.m. to 7 a.m.
- 6. Installation of fixed noise producing devices (such as air conditioning, exhaust fans and refrigeration systems) shall be subject to compliance with applicable fixed source property line standards.
- 7. The proposed helicopter pad shall be use for emergency operations only.
- 8. All construction related activities shall be in conformance with the County's Noise Ordinance.

X. **PUBLIC SERVICES**

Would the proposal create potentially significant adverse effects on, or result in the need for new or significantly altered services or facilities? This could include a significantly increased maintenance burden on fire or police protection, schools, parks, or other public services or facilities. Also, will the project result in inadequate emergency access?

Less Than Significant Impact.

The proposed project is phased expansion of an existing use over 20 years.

XI. **UTILITIES AND SERVICES**

Would the proposal result in a need for potentially significant new distribution systems or supplies, or substantial alterations to the following utilities:

Power or natural gas; Communication systems; Water treatment or distribution facilities; Sewer or septic tanks; Storm water drainage; Solid waste disposal: Water supplies?

Potentially Significant Impact.

The proposed project is phased expansion of an existing use over 20 years. The existing Salvation Army Divisional Camp and Retreat has a backbone infrastructure system that includes 12 Kilovolt electrical lines; a 6-inch waterline, 10,000-gallon water tank and pump; and a septic sewer system. The Specific Plan proposes to handle expanded sewage requirements with an on-site package wastewater treatment plant. However, urban-type growth outside of designated urban areas has been restricted by County policy (Boards Policy I-78) with regards to the location of small wastewater treatment plants. Unless an exception is made to this policy by the Board of Supervisors, package wastewater treatment plants cannot be used on the property due to its distance from the urban limit line of the unincorporated community of Ramona. The Ramona Municipal Water District, which holds the latent sewer power over the site, is on record as discouraging the use of package wastewater treatment plants (LAFCo, 1990). Additionally, the Ramona Community Plan also specifically discourages the use of package wastewater treatment plants. To date, one exception in Valley Center has been granted to this policy.

XII. AESTHETICS

1. Would the proposal result in a demonstrable, potentially significant, adverse effect on a scenic vista or scenic highway?

Less Than Significant Impact.

The proposed Specific Plan would not be visible from Highway 67 or Mussey Grade. Therefore, no impact on the Scenic Highway System would occur. The proposed project also would not change the visual relationship between the subject site and the community. This is because most buildings and structures on-site would be screened from neighboring properties, and because of the large distance between the project site and portions of the community from which the project would be visible.

2. Would the proposal result in a demonstrable, potentially significant, adverse visual effect that results from landform modification, development on steep slopes, excessive grading (cut/fill slopes), or any other negative aesthetic effect?

Potentially Significant Unless Mitigation Incorporated.

Grading for all phases of development will be generally limited to existing flat areas of the property and will be clustered to minimize impacts on topography. In addition, some of the proposed buildings (e.g., the conference center) would also be "stepped" to follow the natural contours of the topography and to further limit landform alteration. Only minor landform alteration would occur. However, the proposed conference center access road will result in a 35-foot cut slope. This is considered a significant impact. The impact will be reduced to below a level of significance by the following mitigation measures:

- 1. The cut and fill slopes associated with the access road to the conference center shall be contour graded to reflect the natural contours of the adjoining topography and revegetated with neighboring native plants.
- 3. Does the project comply with the Steep Slope section (Article IV, Section 5) of the Resource Protection Ordinance?

Yes.

The proposed project has been designed to avoid or minimize encroachment into steep hillsides to the extent feasible.

4. Would the project produce excessive light, glare, or dark sky impacts?

Less Than Significant Impact.

The Specific Plan would be required by County Ordinance to direct lighting away from adjacent properties and uses. The applicant would be required to demonstrate that all development phases comply with the County Light Ordinance prior to the issuance of building permits. The development would also be located in areas where existing topography and vegetation would shield most lighting from adjacent residences. The project design also includes landscaping and the use of low-reflective glazing on buildings to reduce glare. Reflective materials (e.g.) sheet metal) would be limited to roof flashing, gutters or ancillary fixtures required to waterproof the structures, that are not expected to be visible from adjacent land uses.

XIII. CULTURAL AND PALEONTOLOGICAL RESOURCES

1. Would the proposal grade or disturb geologic formations that may contain potentially significant paleontological resources?

Less Than Significant Impact

A review of the paleontological maps provided by the San Diego Museum of Natural History indicates that the project is not located on geological formations that contain significant paleontological resources. The geological formations that underlie the project have a low probability of containing paleontological resources.

2. Does the project comply with the Significant Prehistoric and Historic Sites section (Article IV, Section 7) of the Resource Protection Ordinance?

Yes.

The property has been surveyed by a County of San Diego certified archaeologist/historian, ASM Affiliates, on February 8, 1999 and it has been determined there are five archaeological/historical site(s). It is anticipated that testing and other investigation will determine that the archaeological/historical site(s) that will be impacted do not meet the definition of significant site set forth in the Resource Protection

Ordinance or under the State California Environmental Quality Act (CEQA) Guidelines. Therefore, they do not need to be preserved under RPO. In addition, the project complies with the CEQA because the site(s) has been sufficiently tested and does not warrant preservation.

If, as a result of testing, any of the archaeological/ historical sites are determined to meet the definition of a significant site set forth in RPO or under the State California Environmental Quality Act (CEQA) Guidelines, the project will be redesigned to preserve the site(s) in place for future scientific research. The archaeological/historical site(s) will be preserved in a dedicated open space easement (and fenced) far enough away from development or covered with native vegetation that is sufficient to protect the site(s), or preserved in a dedicated open space easement and capped with a layer of protective soils pursuant to an approved preservation plan, as recommended in California Public Resources Code, Section 21083.2.

- 3. Would the proposal grade, disturb, or threaten a potentially significant archaeological, historical, or cultural artifact, object, structure, or site which:
 - a. Contains information needed to answer important scientific research questions;
 - b. Has particular quality or uniqueness (such as being the oldest of its type or the best available example of its type);
 - c. Is directly associated with a scientifically recognized important prehistoric or historic event or person;
 - d. Is listed in, or determined to be eligible to be listed in, the California Register of Historical Resources, National Register of Historic Places, or a National Historic Landmark; or
 - e. Is a marked or ethnohistorically documented religious or sacred shrine, landmark, human burial, rock art display, geoglyph, or other important cultural site?

Less Than Significant Impact.

The staff archaeologist, Glenn Russell, has examined the archaeological and/or historical resources present on the property and determined the site(s) has either lost scientific integrity or does not

qualify as significant or "unique" as defined in Sections 21083.2 or 21084.1 of the California Public Resources Code.

XIV. OTHER IMPACTS NOT DETAILED ABOVE

None.

XV. MANDATORY FINDINGS OF SIGNIFICANCE

Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Unless Mitigation Incorporated.

As discussed in Section VII, Biological Resources, Questions 1., 2., 3., and 4., the Specific Plan will mitigate significant impacts to biological resources to below a level of significance. As discussed in Section XIII, Cultural and Paleontological Resources, Questions 1., 2. and 3., impacts to cultural resources will not be significant. Therefore, the project will not degrade the quality of the environment and will not substantially reduce the habitat of a fish or wildlife species. The project will not cause a fish or wildlife population to drop below self-sustaining levels and will not threaten to eliminate a plant or animal community. Also, the project would not reduce the number or restrict the range of a rare or endangered plant or animal and will not eliminate important examples of the major periods of California history or prehistory.

2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?

Less Than Significant Impact.

In the completion of this Initial Study, it has been determined that no significant unmitigated environmental impacts will result from the project. Thus, all long-term environmental goals have been addressed.

3. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that

the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Potentially Significant Impact.

The traffic study prepared by Linscott Law & Greenspan (May 1999) identifies the capacity of Mussey Grade Road at Level of Service E as 4,500 ADT. The build-out (year 2015) volumes on Mussey Grade Road are anticipated to be 9,200 ADT south of Highway 67 and 5,700 ADT south of Dos Picos Park Road. The proposed project's build-out trip generation of 376 ADT will result in significant cumulative traffic impacts to Mussey Grade Road and the Mussey Grade Road/Highway 67 intersection.

4. Does the project have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly?

In the completion of this Initial Study, it has been determined that the project will not cause substantial adverse effects on human beings, either directly or indirectly. This conclusion is based on the analysis completed in Sections: I, Land Use and Planning; II, Population and Housing; III, Geologic Issues; IV, Water Resources; V, Air Quality; VI, Transportation/ Circulation; VIII, Hazards; IX, Noise; X, Public Services; XI, Utilities and Services; and XII, Aesthetics. In totality, these analyses have determined that the project will not cause substantial adverse effects on human beings.

XVI. EARLIER ANALYSIS

Earlier CEQA analyses are used where one or more effects have been adequately analyzed in an earlier EIR or Negative Declaration.

- 1. Earlier analyses used: Not Applicable
- 2. Impacts adequately addressed in earlier CEQA documents. The following effects from the above checklist that are within the scope of, and were analyzed in, an earlier CEQA document: Not Applicable.
- 3. Mitigation measures: Not Applicable

XVII. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

- Air in San Diego County, 1996 Annual Report, Air Pollution Control District, San Diego County
- Bay Area Air Quality Management District Assessing the Air Quality Impacts of Projects and Plans, April 1996
- California Environmental Quality Act, CEQA Guidelines 1997
- California State Clean Air Act of 1988
- Circulation Element of the San Diego County General Plan, Part III, Chapter 1
- Conservation Element of the San Diego County General Plan, Part X, Chapter 5, Unique Geological Features, and Appendix G
- County of San Diego Code Zoning and Land Use Regulation Division Sections 88.101, 88.102, and 88.103
- County of San Diego Code Zoning and Land Use Regulation, Division 7, Excavation and Grading
- County of San Diego Groundwater Ordinance (Chapter 7, Sections 67.701 through 67.750)
- County of San Diego Noise Element of the General Plan (especially Policy 4b, Pages VIII-18 and VIII-19)
- County of San Diego Noise Ordinance (Chapter 4, Sections 36.401 through 36.437)
- County of San Diego Zoning Ordinance (Performance Standards, Sections 6300 through 6314, Section 6330-6340)
- Dam Safety Act, California Emergency Services Act; Chapter 7 of Division 1 of Title 2 of the Government Code
- General Construction Storm Water Permit, State Water Resources Control Board
- General Dewatering Permit, San Diego Regional Water Quality Control Board
- General Impact Industrial Use Regulations (M54), San Diego Regional Water **Quality Control Board**

- Groundwater Quality Objectives, San Diego Regional Water Quality Control Board's Basin Plan
- Health and Safety Code (Chapters 6.5 through 6.95), California Codes of Regulations Title 19, 22, and 23, and San Diego County Ordinance (Chapters 8, 9, and 10)
- Housing Element of the San Diego County General Plan, Part IX, 1991-1999, Policy 8, <u>Preserving and Increasing Housing Supply</u>
- LAFCo (Local Agency Formation Commission), Draft Environmental Impact Report for the proposed Expansion of Sewer Latent Powers of the Ramona Municipal Water District, 1990.
- Linscott Law & Greenspan, Traffic Impact Analysis for the Salvation Army Sierra del Mar Divisional Camp, Ramona, California, May 27, 1999
- Merkel & Associates, Inc., Salvation Army Sierra del Mar Camp Biological Constraints and Recommendations Report, June 1999.
- Resource Protection Ordinance of San Diego County, Articles I-VI inclusive, October 10, 1993
- San Diego County Soil Survey, San Diego Area, United States Department of Agriculture, December 1973
- Special Publication 42, <u>Fault Rupture Hazard Zones in California</u>, Alquist-Priolo Special Studies Zones Act, Title 14, Revised 1994
- U.S. Federal Clean Air Act of 1990
- Updated of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production-Consumption Region, 1996, Department of Conservation, Divisions of Mines and Geology

NATIVE AMERICAN HERITAGE COMMISSION 915 CAPITOL MALL, ROOM 384 SACRAMENTO, CA 95814 (916) 653-4082 (916) 857-5390 · Fax



March 22, 2000

RECEIVED MAR 27 2000

Glenn Russell San Diego County, DPLU 5201 Ruffin Road, Suite B San Diego, CA 92123-1666

San Diego County
DEPT. OF PLANNING & LAND USE

RE: SCH # 2000031058—Salvation Army Divisional Camp and Retreat Specific Plan

Dear Mr. Russell:

The Native American Heritage Commission has reviewed the above mentioned NOP. To adequately assess the project-related impact on archaeological resources, the Commission recomends the following action be required:

- 1. Contact the appropriate Information Center for a records search. The record search will determine:
 - Whether a part or all of the project area has been previously surveyed for cultural resources.
 - Whether any known cultural resources have already been recorded on or adjacent to the project area.
 - Whether the probability is low, moderate, or high that cultural resources are located within the project area.
 - Whether a survey is required to determine whether previously unrecorded cultural resources are present.
- 2. The final stage of the archaeological inventory survey is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - Required the report containing site significance and mitigation be submitted immediately to the planning department.
 - Required site forms and final written report be submitted within 3 months after work has been completed to the Information Center.
- 3. Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check.
 - A list of appropriate Native American Contacts for consultation concerning the project site and assist in the mitigation measures.

Lack of surface evidence of archeological resources does not preclude the existence of archeological resources. Lead agencies should include provisions for accidentally discovered archeological resources during construction per California Environmental Quality Act (CEQA) §15064.5 (f). Health and Safety Code §7050.5 and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery and should be included in all environmental documents. If you have any questions, please contact me at (916) 653-4038.

Debbie Pilas-Treadway

Associate Governmental Program Analyst

CC: State Clearinghouse

DEPARTMENT OF FISH AND GAME

South Coast Region 4949 Viewridge Avenue San Diego, California 92 123 (858) 467-4201 (858) 467-4235 FAX



March 29, 2000

Glenn Russell San Diego County, DPLU 5201 Ruffin Road, Suite B San Diego CA 92123-1666

Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Salvation Army Divisional Camp & Retreat Specific Plan City of Ramona, County of San Diego (SCH# 2000031058)

Dear Mr. Russell:

The Department of Fish and Game (Department) appreciates this opportunity to comment on the above-referenced project, relative to impacts to biological resources. To enable Department staff to adequately review and comment of proposed project, we recommend the following information, if not included in the NOP, be included in the Draft Environmental Impact Report (DEIR):

- 1. A complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats.
 - a. A thorough assessment of rare plants and rare natural communities, following the Department's May 1984 Guidelines (revised August 1997) for Assessing Impacts to Rare Plants and Rare Natural Communities (Attachment 1).
 - b. A complete assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.
 - c. Rare, threatened, and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, § 15380).
 - d. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 327-5960 to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas

identified under Chapter 12 of the Fish and Game Code.

- 2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts.
 - a. CEQA Guidelines, § 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
 - b. Project impacts should be analyzed relative to their effects on off-site habitats. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas, should be fully evaluated and provided.
 - c. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
 - d. A cumulative effects analysis should be developed as described under CEQA Guidelines. § 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
 - If applicable this document should include an analysis of the effect that the project e. may have on completion and implementation of regional and/or subregional conservation programs. Under § 2800-§ 2840 of the Fish and Game Code, the Department, through the Natural Communities Conservation Planning (NCCP) program, is coordinating with local jurisdictions, landowners, and the Federal Government to preserve local and regional biological diversity. Coastal sage scrub is the first natural community to be planned for under the NCCP program. The Department recommends that the lead agency ensure that the development of this and other proposed projects do not preclude long-term preserve planning options and that projects conform with other requirements of the NCCP program. Jurisdictions participating in the NCCP program should assess specific projects for consistency with the NCCP Conservation Guidelines. Additionally, the jurisdictions should quantify and qualify: 1) the amount of coastal sage scrub within their boundaries; 2) the acreage of coastal sage scrub habitat removed by individual projects; and 3) any acreage set aside for mitigation. This information

Glenn Russell March 29, 2000 Page3

should be kept in an updated ledger system.

- 3. A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.
 - a. Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize project impacts. Off-site compensation for unavoidable impacts through acquisition and protection of high-quality habitat elsewhere should be addressed.
 - b. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts (Attachment 2).
 - c. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.
- 4. A California Endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of a 2081 permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a 2081 permit. For these reasons, the following information is requested:
 - a. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.

Glenn Russell March 29, 2000 Page4

- b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.
- 5. The Department has responsibility for wetland and riparian habitats and opposes any
 - alteration of a natural watercourse that would result in a reduction of wetland acreage or wetland habitat values. Alterations include, but are not limited to: conversion to subsurface drains, placement of fill or building of structures within the wetland and channelization or removal of materials from the streambed. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. A formal wetland delineation following U.S. Army Corps of Engineers (ACE) protocol may also be necessary prior to any construction in wetland or riparian habitats. Results should be included in the EIR. Please note, however, that wetland and riparian habitats subject to the Department's authority may extend beyond the areas identified in the ACE delineation.
 - The Department may require a Lake or Streambed Alteration Agreement, pursuant a. to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to the applicant's commencement of any activity that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank (which may include associated riparian resources) of a river, stream or lake, or use material from a streambed. The Department's issuance of a Lake or Streambed Alteration Agreement for a project that is subject to CEQA will require CEQA compliance actions by the Department as a responsible agency. The Department as a responsible agency under CEQA, may consider the local jurisdiction's (lead agency) Negative Declaration or EIR for the project. To minimize additional requirements by the Department pursuant to Section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement. A Streambed Alteration Agreement form may be obtained by writing to The Department of Fish and Game, 4949 Vievridge Ave.San Diego, California 92123 or by calling (858) 636-3160.

The Department holds regularly scheduled pre-project planning/early consultation meetings. To make an appointment, please call our office at (858) 636-3160.

Thank you for this opportunity to comment. Questions regarding this letter and further

Gienn Russell March 29, 2000 Page5

coordination on these issues should be directed to Erinn Wilson at (858) 636-3167.

Sincerely,

William E. Tippets

Habitat Conservation Supervisor

cc: Department of Fish and Game

C.F. Raysbrook

San Diego

U.S. Fish and Wildlife Service

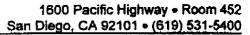
Carlsbad

U.S. Army Corps of Engineers

Los Angeles

State Clearinghouse

Sacramento



San Diego Local Agency Formation Commission

Website: www.sdlafco.com

Chairwoman

Julianne Nygaard Councilmember. City of Carlabad

March 30, 2000

Vice Chairman

Andrew L. Vanderlaan Public Member

TO:

Glen S. Russell, Environmental Management Specialist

Department of Planning and land Use

Local Agency Formation Commission

(MS O650)

Members

Bill Hom County Board of Supervisors

FROM:

Joe Convery, Local Governmental Analyst

(MS A216)

Dianne Jacob County Board of

Supervisors

SUBJECT:

Notice of Preparation of an Environmental Impact Report;

Salvation Army Divisional Camp and Retreat Specific Plan;

Major Use Permit P70-379W2; Log No. 98-14-023

Patty Davis Councilmember, City of Chula Vista

Harry Mathis Councilmember, City of San Diego

Ronald W. Wootton Vista Fire Protection District

District Member (vacant)

Thank you for the opportunity to review the above referenced notice. We offer the following comments:

The notice does not indicate if water will be provided to the project by the Ramona Municipal Water District (MWD). Currently, not all of the project area is within the Ramona MWD. If the MWD is to serve the area, Assessor's Parcel Numbers 232-030-02, 232-031-01, 322-031-02, and 322-060-01 will have to be annexed into the district. Also, Ramona MWD's sphere of influence will have to be amended to include these parcels.

Alternate Members

Greg Cox County Board of Supervisors

Mary Teresa Sessorn City of Lamon Grove

Juan Vargas Councilmember. City of San Diego

Bud Pocklington South Bay Irrigation District

Guy W. Winton III Public Member

Executive Officer Michael D. Ott

Counsel John J. Sansone The notice indicates that a package sewage treatment plant will be constructed to serve the project area. The environmental impact report (EIR) should note that the formation of a county sanitation district to operate the plant will be subject to Local Agency Formation Commission (LAFCO) review and approval.

In 1988, LAFCO approved the formation of the Mt. Woodson Ranch Sanitation District to operate a proposed package sewage treatment plant in the Mt. Woodson Development. Prior to the plant being constructed, the property owner and the Ramona MWD entered into an agreement to extend sewer services to the development from Ramona MWD's Santa Maria treatment plant and the sanitation district was dissolved. Given this history, the EIR should discuss and evaluate the extension of sewer services to the project area from existing Ramona MWD facilities.

Glen S. Russell Page Two March 30, 2000

I am the contact person for this project. If you have any questions, or would like to discuss these comments further, please contact me at (619) 531-5400.

Sincerely,

OE CONVERY

Local Governmental Abatyst

JC:tm

cc: Robert McCullough, General Manager, Ramona Municipal Water District



GOLDEN EAGLE WEST

15444 Mussey Grade Road • Ramona, CA 92065-7434 • Voice: (760) 788-5623 • Fax: (760) 788-4652

March 30, 2000

RECEIVED

Joe Farace
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123-1666

San Diego County
DEPT. OF PLANNING & LAND USE

Re:

Major Use Permit P70-379W2; Log No. 98-14-023 Salvation Army Divisional Camp and Retreat

Dear Mr. Farace:

Please be advised that John C. Mabee, doing business as Golden Eagle Farms (with Golden Eagle West being a division of Golden Eagle Farms), is the landowner of the property located due north of the Salvation Army Camp at 14488 Mussey Grade Road, Ramona, California. The former owner of the property was Spearl Ellison operating as the Ellison Horse Ranch. For some reason Golden Eagle has not been receiving any documentation regarding the modification of the Major Use Permit that has been filed by the Salvation Army.

Therefore, please update your mailing list so that Golden Eagle receives any and all documentation regarding public notices, notices of public hearings, environmental impact reports, etc. for the Salvation Army's modification of Major Use Permit. If possible, information should be mailed to the following two addresses:

John C. Mabee 4545 Yerba Santa Drive San Diego, California 92115

Golden Eagle West Attn: Linda Conde 15444 Mussey Grade Road Ramona, California 92065

We appreciate your attention to this matter. We wish to be involved in this process and will be making public comment on the status of this modification.

If you have any questions or concerns, please contact me at (760) 788-5623.

Very truly yours,

GOLDEN EAGLE WEST

Linda Conde

Asst. Farm Manager



RAMONA MUNICIPAL WATER DISTRIC

105 Eartham Street Ramona, California 92065-1599 Telephone: (619) 789-1 ECEIVE

APR 12 2000

San Diago County DEPT. OF PLANNING & LAND

March 30, 2000

County of San Diego
Department of Planning and Land Use
Project Processing Counter
5201 Ruffin Road, Suite B
San Diego, CA 92123

RE: Salvation Army Campground Environmental Impact Report, Major Use Permit P70-379W²; Log NO. 98-14-023

To Whom it May Concern:

The purpose of this letter is to provide comments regarding the proposed Salvation Army Campground expansion. The Ramona Municipal Water District would like to make the following comments:

- 1) The specific plan for the Salvation Army Divisional Camp and Retreat mentions that the existing 6-inch water main within Mussey Grade Road will be replaced during the construction by a new 8-inch water main. In review of the current hydraulic model for the Ramona Municipal Water District's water distribution system, the District has determined that this water main replacement will not be sufficient in order to achieve the following estimated usage and fire flows at the proposed Salvation Army Campground expansion site:
 - The Salvation Army Campground is estimated to use a maximum of 55,000 and 100,000 gallons per day for public and irrigation consumption, respectively.
 - The California Department of Forestry may require the potential to achieve a fire flow of either 1,500 or 2,500 gallons per minute (depending if the campground is considered a residential or commercial setting) to the site at all times.

In a hydraulic analysis performed for the Salvation Army, it was discovered that the installation of a second water line in Mussey Grade Road to compliment the existing water line would increase water flow to the Salvation Army Camp site drastically in high-demand scenarios. The District has made the following requirements for water main extensions:

• For a required fire flow of 1,500 GPM, it has been determined that with the installation of an 8-inch pipeline from Dos Picos Park Road to the



RAMONA MUNICIPAL WATER DISTRICT

105 Eartham Street Ramona, California 92065-1599 Telephone: (619) 789-1330

intersection with the existing 6-inch diameter pipeline in Mussey Grade Road will be satisfactory (see Figure 1).

- For a required fire flow of 2,500 GPM, the District will necessitate the installation of a 10-inch pipeline from Dos Picos Park Road to the intersection with the existing 6-inch diameter pipeline in Mussey Grade Road, the improvement of the existing 6-inch pipeline in Mussey Grade Road between State Highway 67 and Oak Valley Road to an 8-inch pipeline, and improvement of the existing 20-inch pipeline between Mt. Woodson Reservoir and Archie Moore Road to a 24-inch pipeline (see Figure 2).
- 2) The proposed package wastewater treatment plant has the potential to impact the quality of surface and ground waters. The site does not lie within the District's sewer service area. If the Salvation Army Camp site made a request for sewer service, it would need to apply for annexation into the District's sewer service area in addition to installing an 8-inch sewer line several thousand feet to the site, including all necessary appurtenances and pumps.
- 3) Run-off from roadways, paved parking areas and developed portions of the site also has the potential to impact surface and ground water quality. However, as stated in the environmental analysis form for the Salvation Army Divisional Camp and Retreat, the site expansion does not call for substantial extensions of existing roads or new roads systems into previously unserved areas. Therefore, the District does not anticipate a vast impact on surface and ground water quality due to run-off.

If you have any questions regarding this statement, please do not hesitate to call me at (760) 789-1330.

Sincerely,

RAMONA MUNICIPAL WATER DISTRICT

Robert Scholi

Assistant Engineer

Robert Scholl

PR 072000

P.O. Box 33 BEST. OF PLANNING & LAND USE

San DIEGO, CA 92/63-3332

619-276 4694

COUNTY OF SAM DIZED

DEPARTMENT OF PLANNING AND LAND USE

52 OI RUFFIN ROAD, SUITE B

SAM DIZEO, CA. 92123 - 1666

ATTH: GLENN S. RUSSELL

RE: MASOR USE PERMIT P70-379W2 LOG NO 98-14-023

This is to acknow/edge veceipt of The
NOTICE of PREPARATION OF AN INVIRONMENTAL
IMPACT, DATED MARCH 16, 2000, WHICH HAS
REEN SENT TO ME, A CO-DWNER OF CONTIGUOUS
ADDACENT LAND, 80 ACRES, APN 322-030-09-0.

AS THE DPLU LAS PREVIOUSLY BEEN INFORM
THIS IS TO REMIND THE DEPARTMENT, SAID
ADJACENT BOACRES IS "LAND LOCKED". It IS
REQUESTED ANY PLAN CHANGE FOR THE HEXT 20 YEARS
IN CLUDE PLANS OR PROVISIONS TO PROVIDE
A FRIENDRY ACCEDS TO OUR LAND.

RESPECT FULLY YOURS,

D.D. M. CHRTHUR, TRUSTES

MC ARTHUR FAMILY TRUST UDT 9-15-78

CE EST. L.P. LUCK, CO-OWNER

2801 PARK CENTER APT A1200 ALEXANDRIA, VA 22302

RAMONA COMMUNITY PLANNING GROUP

| Meeting Date: April 6,2000 Motion: | NOPEIR Solvation Army |
|-------------------------------------|-------------------------|
| to send, to the Comments; | OPLU the following |
| | |
| | Brends Freman Chan ROPE |

- 1) New plan requires small package treatment plant which is against RC Plan and Policy I-78. Board of Supervisors would have to waive this to allow the treatment plant. Group recommends no package treatment plant.
- 2) New plan requires a new water main line which is 8" diameter to the site. Recommend no new water line.
- 3) Traffic calc states that a total of 386 ADT would be required at build out of site plan. Committee requests a revisit of said ADT for possible error in calculation (850 persons permitted with new use).
- 4) Which landfill will be impacted by the proposed build out and please add to traffic calc of ADT.
- 5) Eagle expert to study if the nest in area (Soul Rock) will be affected.
- 6) Water table? How would the 100,000 gallons per day affect the water table of the area and the quality of water in the area.
- 7) Fire safety hazard issue. 3 fire pits are proposed. Concern from the committee regarding their use during fire season especially.
- 8) Concerns regarding the cumulatively impact of this and other proposed development to the character of the community.
- 9) #3 on page 3 of the Environmental Analysis Form asks the question, "Does the proposal have the potential to be incompatible with existing or planned land uses or he character of the community". The response is "Less than Significant Impact". The subcommittee disagrees with this statement and asks the county to reconsider the response.
- 10) #5 on page 12 of the Environmental Analysis Form asks the question, "Does the proposed project conform with the Multiple Species Conservation Program (MSCP) and Biological Mitigation Ordinance (BMO)? The form states YES, however the committee feels this response is in error. The subcommittee requests further investigation as to the accuracy of the response.

Constance Neugonid 23619 Barrego Way Ramona, CAP 92065

RECEIVED

San Diego County
DEPT. OF PLANNING & LAND USE

April 10, 2000

Country of San Dieso Department of Planning and Lond Use 5201 Ruffin Road, Suite B San Dieso, CA 92123-1666

RE' Notice of Preparation Of AN Envison mental Impact Report Major Use Fermit P10-379WZ Log No. 48-14-023 Salvation Army Divisional Camp: Retreat Specific Plan

This is a Comment letter to be recorded as part of the permanant record for this project.

HISTORY: The land use history of this area is long i varied. Human use of this area orignally was lumbing i gathering by the wative American tribes. Grasslands

supported deer, air i water fowl, and antelope while Oak trees: Pine trees and local plants supplied nutritional, high protein Sources of food. This agri-eco-system was interrupted with the arrival of the Spanish, then Mexicum and finally American Covernments

Throughts in a Stolen Land, American Indians in Sen Day olssers

Close to nature, libertarian Small

human groups depending on this

ogri-ecosystem were moved onto

mission lands is then to reservational with Theodore Rocsevelt trying to maintain the hunting lands by creating the Cleveland National Forest Salvation Armys Divisional
Camp Site is nestled on these Oak - Grasslands in the Coastel
Mountains of the Ramona Community
Planning Area, surrounded by
Northial Rural Ranch & Wildlands It is a non-profit organization, so the infra structure burden is totally beared by the taxpayer.

Analysis of Initial Study Standards to analyse this Study is useful, 1. Natural, Organic Agricultural systems such as the local present ranching in the area are close to the fleistoceno Standard - Our Human Genome developed in similar treed grasslandy in family, community oriented groups Normally than 25. ("Coming home to the Fliestocene by Paul Shepard) 2. Stundard 2 would be characterized by large, dense, highly controlled Factory Farms characterized by the need for large food distribution and waste and water disposal systems,

(see page of " the unbearable Journey) This Kind of agriculture is not found in this local area. Description of Project Expanded Cabin Camping Conformant 240 Occupants - Too Many Expanded and Relocated Tent Campin Component
100 Occupants Too Many
Notice Study Educational Component
TEO occupants - Too Many

Expanded: Kelocarea Conf. Component (
175 occupants - too Marry Expanded Remote Overnight Camp Av. Recreational Vehicle Parking Area Expanded Support Eacilities Too Bio! Resembles a factoryresort rather than an unurhan God - Bonding Nature Experience found amount a close - Knut Bonding Group of family and Friends. The Package water treatment plant indicates the scope & size of this piece-meeting for future projects in the avera? Conclusion In this initial Study analysis, it is plain that this plan does Not 1. Fit into the current rural character 2. Offer inner-city residents a meaningful environment to bond Naturally with each oth and Naturally with each oth and Nature.
3. Is too sie for the area's infrastructure.

(

The non-profit status of

this organization probably depends
on its ability to provide quality
benefits to the community;

Service to its occupants.

The RV parkingand Expanded Remote Overnight
Comps Area Sound reasonable to support
Small group spiritual experience
Based on Pliestoceus Standards.

Please make these comments part of the permanent public record.

Sincerely Constance Mengard



San Diego County DEPT. OF PLANNING & LAND USE

April 10, 2000

Glenn Russell
County of San Diego - Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: Notice of Preparation of an Environmental Impact Report (Salvation Army Sierra del Mar Divisional Camp and Conference Center, Major Use Permit #P70-379W²)

Dear Mr. Russell:

E

Thank you for mailing me the Notice of Preparation of an Environmental Impact Report for the Salvation Army project in Ramona. Also, thank you for taking the time to discuss this issue with me on the phone. I have attached a letter I wrote to the DPLU regarding this matter on June 29, 1999. I still feel that these concerns regarding the proposed Salvation Army expansion are valid and should be addressed in the EIR.

The addition of a package wastewater treatment plant to their proposal has brought new concerns. I am told that the Board of Supervisors has a Policy (I-78) that restricts package wastewater treatment plants outside of designated urban areas. In the event that Boards Policy I-78 is waived, I would hope that the EIR addresses the ramifications of a package wastewater treatment plant located on the Salvation Army's acres in the event the Salvation Army should decide to sell the property. If a treatment plant were built, the value of the property would increase tremendously and development would be inevitable.

In addition, the NOP doesn't indicate that the EIR will address the safety hazards regarding emergency fire evacuation – for both the Salvation Army occupants and the local Mussey Grade residents. Neighbors have relayed stories regarding previous Mussey Grade fire evacuations and fact that the single egress quickly becomes clogged with families and horse trailers. The fire issue here is so serious that (in my opinion) hundreds of lives could potentially be affected. Please consider this issue in the EIR with the utmost of care.

Also, it seems that the NOP indicates that the EIR would not include investigating the potential for the loss of property values in the area. Personally, I am convinced that our property would decrease in value should the Salvation Army build a 24,000 square foot dining facility for 600 people a few hundred feet outside out front door.

Finally, it is my understanding that there is no requirement that the Salvation Army's proposed 20-year plan be implemented over a 20-year period. In other words, if their proposed plan is approved, 20 years could potentially become 2 years. I would therefore suggest that the EIR <u>cannot</u> assume that this proposed project would take place over 20 years, but <u>must</u> consider the impact on our community if it were completed immediately.

Thank you very much for your time and consideration in this matter.

Sincerely,

Michael Hanus

14776 Mussey Grade Road Ramona, CA 92065 (760) 788-7806 mhanus@cts.com

Midray Hann

Comments on the Proposed Master Plan for the Salvation Army Sierra del Mar Divisional Camp and Conference Center located in Ramona California
June 29, 1999

Summary

The following are concerns regarding the Proposed Master Plan for the Salvation Army (SA) Sierra del Mar Divisional Camp and Conference Center at 14488 Mussey Grade Road in Ramona. The plans have been submitted to San Diego County Department of Planning and Land Use for a proposed amendment to the Major Use Permit (MUP) #P70-379W.

The Proposed Compound:

- Would not be consistent with community character (rural residential and agricultural)
 - · Would not be harmonious in scale and density with the surrounding community
 - Structural Density 13 to 40 times more dense than surrounding area
 - Population Density over 1500% more dense than surrounding area (at peak capacity)
 - Would negatively affect open space views for neighboring property owners
 - Would devalue surrounding properties

Cannot be supported by the existing infrastructure

- Would require an upgraded water main on Mussey Grade (from 6" to 8") which is a
 growth inducing factor
- Would tax existing public services (Fire and Rescue)
- Would impact traffic (increase street maintenance needs, drive times, noise levels)
- Is inconsistent with goals of the County General Plan 2020
- Would increase community costs and return little (most guests would not frequent Ramona shops, businesses, gas pumps, etc.)
- Would require Ramona services support high-density use in remote area appropriately zoned for low-density use
- May pose a threat to groundwater from proposed high density septic system (no protection for neighboring wells)

· Would create serious fire issues

- . The high-density of inner-city children would increase the risk of accidental fire
- There will be no on-site transportation to respond to a fire emergency
- Mussey Grade (a dead-end road) is the only entrance/egress from the site a fire at the entrance of Mussey would essentially trap them
- Recent evacuations of Mussey Grade Road resulted in traffic jams the road capacity simply cannot handle fire emergency evacuation in greater numbers

Would create significant environmental impacts and the need for an EIR under CEQA

- Adjacent to the City of Poway's Iron Mountain Cornerstone Open Space/Resource Management Area - a significant biological conservation area
- Near Golden Eagle Nesting Site
- Within the MSCP study area
- Provides California Gnatcatcher habitat (an endangered species, the California Gnatcatcher was identified on the site during previous biological surveys)
- Watershed impacted with loss of current recharge and filtering capacity of the open space and increased pollution in stormwater runoff
- Aforementioned traffic, circulation, life safety, infrastructure impacts must be evaluated in an EIR

History of Land Use

The First Presbyterian Church of San Diego opened a camp/retreat call Rancho Del Cielo in 1970. Their facility totaled 562 acres located at 14488 Mussey Grade Road in Ramona. The initial MUP allowed 5 cabins, a program lodge hall, dining room and swimming pool with bath facilities. The MUP was amended in 1976 to allow 5 additional cabins, youth activities building, and 2 staff housing units.

The Salvation Army purchased these 562 acres (and eventually 13 additional acres including 2 single-family homes) in March of 1997 and called it the Sierra del Mar Divisional Camp and Conference Center.

In September of 1997 the County of San Diego Department of Environmental Health issued a Notice of Violation for non-conformance with the existing MUP. These violations included utility, electrical, and plumbing hook-ups, the addition of 5 tent-like structures ('yurts'), an occupied mobile home, and a large assembly tent - all not part of the existing MUP. The MUP was amended once again in March of 1998 to grandfather these additions into the MUP.

In approximately August 1998 the Salvation Army submitted a Proposed Master Plan to the San Diego County Department of Planning and Land Use which would require another modification to the Major Use Permit.

Harmony in scale, bulk, coverage, density

To compare the magnitude of the proposed SA project to the adjacent property, I looked at the SD County Assessor's map 327-011 (land adjacent to, and east of the SA site on Mussey Grade Road) which shows 37 lots covering approximately 700 acres. This is approximately 18.9 acres per tot (700 acres / 37 lots). The average size home in this area is 1638.9 square-feet (24,584 total sq-ft / 15 homes listed). I obtained the housing statistics from an Old Republic Title Company listing of the homes located in the area covered by the SD County Assessor's map 327-011, which was dated 07/22/98. This area was chosen because it represents the area adjacent to the SA site in which our neighbors and we live. It should be noted that other areas surrounding the SA site are even less dense because of the large ranches. Dos Picos Park, and the Iron Mountain Open Space Preserve. The comparisons below are made with respect to the most developed adjacent area.

The text of SA Master Plan is vague but it does state that some structures would be built in the following scale:

Conference Component - average 10,350 sq-ft each (72,500 total sq-ft / 7 structures)

Dining Facility - 24,000 sq-ft

Multi-Purpose Building - 21,000 sq-ft

Staff Housing - 31,500 sq-ft (number of units unspecified in the text of the SA Master Plan)

To be harmonious in scale and bulk with the structures in the surrounding area, the largest buildings would be closer to the size of the largest homes in the area (2648 sq-ft) and not tens-of-thousands of square feet.

The proposed Conference Component contains "five two-story, motel style buildings". I am unaware of any structures of this style within a 5-mile radius of their proposed Conference Center. Resort-style development is incompatible with the residential character of the area.

From the Proposed Master Plan, at least 263,400 sq-ft is planned for approximately 60 buildings. This is the equivalent of 160.7 similar-sized homes in the area (263,400 total sq-ft / 1639 sq-ft per average home). If SA land were divided in similar-sized lots as the adjacent properties, the 575 acres would be divided into 30.4 lots (575 acres / 18.9 average acres per lot in the area).

Assuming one house per equivalent lot (a generous assumption since many of the lots in the area do not contain any structures), the SA property would reach maximum compatible density at 30 homes. The current proposal is the equivalent of 160 additional homes in this area. To be compatible in density and coverage with the maximum number of structures in the surrounding area, a maximum build-out of the equivalent of 30 homes would be allowed and sufficient infrastructure to support the added demand on services would be required.

Another way to compare the magnitude of their proposed plan is to look at the density of existing structures in the immediate area. The SA proposed 458.1 sq-ft per acre (263,400 sq-ft / 575 acres) is about 13 times more dense than the 35.1 sq-ft per acre (24,584 total sq-ft over 700 acres) density of existing structures in the adjacent area.

Additionally, much of the SA property is unbuildable because of the terrain. The Proposed Master Plan states: "The existing site is primarily mountainous, with steep slopes on the western portion of the site." This means that the proposed structures will not be spread evenly over 575 acres, but actually concentrated in a smaller area on the eastern portion of the site (the architect estimates only about 30% of the land would be affected by development of the master plan). If the proposed plan were built over 172 acres (30% of 575 acres), the actual density at the compound would be over 40 times denser than the surrounding area.

The current population density of the area (located in Assessor's map 327-011) could be approximated at 0.09 person per acre (15 homes *approximately 4.2 persons per household / 700 acres). In contrast, at full capacity the population at the SA compound would be approximately 1.5 persons per acre (850 people / 575 acres). During peak occupancy, the population density would be over fifteen hundred percent greater (((1.5 - 0.09) / 0.09) * 100 = 1566%) than surrounding neighborhoods. In reality, population density in the major components of the SA compound would be even higher because the steep hillsides will concentrate the added visitors and residents in the relatively level areas.

Note that their *current* maximum overnight population is approximately 0.5 person per acre (284 people / 575 acres), a population already five times more dense than the surrounding area. Exceptions were already made when the current MUP was granted in 1970 and amended twice since. Another amendment to increase the intensity of land use even more is, in our opinion, unacceptable.

The generation of traffic and the capacity and physical character of surrounding streets

The only way into (and out of) their compound is via Mussey Grade Road. Because their primary forms of transporting individuals to and from the facility is by bus and recreational vehicle, consideration should be made to the increased wear-and-tear of Mussey Grade Road. Additional traffic load on the intersection of Highway-67 and Mussey Grade Road would require traffic engineering studies.

Availability of public facilities, services and utilities

SA facilities would increase demand for public water and electricity. Will the increased demand affect Mussey Grade and Ramona residents?

SA facilities as proposed would not build in sewage treatment nor connect to sewer treatment - but would use septic systems to treat the waste of 850 people. Actual capacity of the land to properly filter and treat the waste is dependent upon proper use and maintenance. Groundwater and well water is essential to the neighboring parcels, and this resource will receive no financial quarantees or protections under current proposals. [I personally have plans to install a well on our

property which is adjacent to the east side (and downgrade) of the SA property. I would like to know if the SA septic systems would have any impact on the quality of our future drinking water.]

Availability and effectivity of fire and rescue services are of great concern to the local residents. Mussey Grade Road is a dead-end road. During the summer (SA peak population months) Ramona is at great fire risk. The increased population on Mussey Grade coupled with the very real danger of fire, and the potential danger should Mussey Grade become impassible for evacuation, creates the potential for a devastating disaster.

The SA plans to bus people in-and-out of their compound using chartered bus service - vehicles and drivers will not be kept on-site. This means that there is no transportation readily available for potentially more than 800 people in the event of a fire! When questioned on this point, SA stated that they had an agreement with the school system that would allow them to use local school bus capacity in the event of an emergency.

There are two major problems with the above scenarios - the availability of fire department personnel and the availability of school busses (and drivers) for evacuation purposes. In a rural area, fire fighter capacity may be quickly exceeded in the event of wildfire(s). If evacuation of Mussey Grade Road is mandated, school bus and/or school bus drivers will not always be available for evacuation purposes - especially during the summer months of peak SA activity and fire risk.

On the other-hand, I understand that on one occasion (possibly more) a life-flight helicopter has had to respond to an emergency at the facilities now run by the SA. I believe the SA has plans for a helicopter pad, which could be extremely useful in the event of an emergency - but has the drawbacks associated with helicopter access as it may be used for other purposes in the future.

The harmful effects upon desirable neighborhood character

Current activity at the SA camp creates a decent amount of noise. Most of the noise is usually people/children cheering and screaming - I assume from group athletic activities at the camp. In addition, on some occasions neighbors have had to listen to group singing and band practice. A bugle blowing reveille at 7 A.M. intrudes on the country quiet the neighborhood normally enjoys. However, the current noise from the SA has usually subsided by 10:00 PM and only on rare occasion continuing until 11:00 PM. Noise impacts will increase with increased population. Noise studies must be done in an EIR to understand the increased impact on neighbors and wildlife.

Some residents have expressed concern regarding the character of some of the children being brought to the camp. We all agree that the camp portion of their compound isn't a bad thing, but bringing inner-city children to such a rural area naturally promotes concern regarding vandalism, crime, and increased fire risk. I have absolutely no reason to believe that any teen-aged youth at the SA camp has ever caused any problems. On the other hand, I do have very real concerns that a teen-age youth may slip out to have a cigarette and my loved-ones could potentially be endangered by fire.

The suitability of the site for the type and intensity of use or development which is proposed

The site of the SA camp is appropriate for a low-density kid's camp. It is in a beautifully scenic, rural area. Many of the adjoining properties are compatible with low-density camp use - there is even Dos Picos Park in the immediate area. The compound borders the City of Poway's Iron Mountain Cornerstone Open Space/Resource Management Area, a biological conservation area. (I have yet to learn what impact the proposed plan would have on either the park or Iron Mountain.) The Presbyterian Church has successfully used the current location for similar low-density activity in the past.

Our concern is that this site is not suitable to sustain the intensity of use or development proposed. We feel that any further increases are incompatible with current zoning and general plan goals.

This area of the community is residential/agricultural. There are no other commercial ventures in the nearby vicinity that cater to tourism or contain hotels/motels. One must view the 'camp' as if it were such a commercial venture since the proposed plan contains recreational areas, conference center, RV park, theater, and other components not usually associated with a 'campground'. If the increased land use were allowed to the Salvation Army, there would be no future obstacle to prevent the property from being utilized as a resort in the future.

Other relevant impact of the proposed use

Residents have expressed concern over the potential use of lights at the facility. Light pollution from the softball field, soccer field, tennis court, or basketball court will alter the rural character of our neighborhood and impact views of the night sky.

Residents have expressed concern over the potential issues involving animals, trees, groundwater, and the living environment. CEQA requires the environmental impact of such a massive proposal be studied closely. Existing environmental impacts with the *current configuration and levels of activity* have not been evaluated for compatibility with the MSCP and may bear reduction to achieve the counties goals for habitat preservation.

Adjacent neighbors will have impacts to their views, and commercial type operations will now take place where single family homes used to sit. Our view of the surrounding hills and mountains (the main reason we moved to Ramona) could become partially obscured by some of their multi-story proposed buildings. Their central dining facility (24,000 sq-ft), multi-purpose building (21,000 sq-ft), mini-theater, and associated parking lots are slated for location only a few hundred yards to the west of our property line. There is a proposed 'maintenance area' at the current location of a single-family home directly adjacent to the north side of our property and only a few hundred feet from our house. *Property values would be seriously impacted* by the proposed SA plans.

Other Questions/Comments

What is the SA's connection to the Ramona community? According to the SA, the vast majority of people spending any time at the SA camp will not use local restaurants, gas pumps, shopping facilities, or any other viable business located in Ramona. Would there be any employment opportunities for residents of Ramona?

At a Ramona West-End Planning Group Sub-Committee meeting in 1998, the SA representatives stated that some of the SA camp facilities (e.g., the 21,000 sq-ft "multi-purpose building") would be available for public use. At a subsequent Ramona Planning Group meeting they seemed to have backed-off on that idea because of concern regarding traffic, noise, etc. I don't know their current position on this issue, but if potentially 700 individuals were to come to the SA camp for an event (at the same time, in individual vehicles - not busses) a whole new light would be shed on the noise/traffic/road-use/parking issues. There is nothing in the Proposed Master Plan that indicates whether the SA plans to provide public access to their facilities for community use.

I understand the need for indicating the "anticipated phasing" with regard to planning, but as their Proposed Master Plan states... "Since much of the development of for [sic] this project will be funded through donations, it is difficult to anticipate the exact order of phasing for this project." The SA has indicated an outline for a "20-year 20-million dollar plan". It was also explained that if a particular donor were to provide monies for an RV park, (a component anticipated to be built in

the 17-20 year phase) if allowed they would begin construction immediately. I also understand that the SA has recently received (from Mrs. Joan Kroc) the largest donation in the history of their organization - \$80,000,000.00. If that money were earmarked for the SA camp in Ramona, I assume that the SA would likely begin construction on the ENTIRE project as soon as possible.

Planners should not assume that the city infrastructure would be more capable of handling a portion of the project when it is 'anticipated' for construction since nothing holds them to a schedule. Even if the SA were to offer to mitigate all the public impacts associated with their proposal, the impacts to private property owners on Mussey Grade cannot be mitigated. The impact to good planning for Ramona cannot be mitigated.

The Salvation Army already has a camp at the site in question - a camp that has been successfully operated for 29 years. We, the community, have already made concessions in allowing the current operation at the current capacity. It is already exceptional when compared to the surrounding area and further additions are inappropriate.

We therefore request that the San Diego County Department of Planning and Land Use NOT approve the current request for a modification to Major Use Permit #P70-379W.

April 13, 2000

RECEIVED

Department of Planning and Land Use 5201 Ruffin Road, Suite B San Diego, California 92123-1666 San Diego County
DEPT. OF PLANNING & LAND USE

Re: Salvation Army Divisional Camp and Retreat Major Use Permit P70-379W2; Log No. 98-14-023

Gentlemen:

We have received documentation from the Department of Planning and Land Use regarding a Notice of Preparation of an Environmental Impact Report regarding the above-referenced modification of a Major Use Permit by the Salvation Army. In that document public comments were solicited. We wish to respond.

After thoroughly reviewing the document, we disagree with findings as set forth in the Environmental Analysis Form portion of the document. We understand that an Environmental Impact Report will be prepared and that we will be given an opportunity to comment on that report. However, we wish to proceed at this time to make our views known to the Department of Planning and Land Use regarding this project.

Golden Eagle West is located directly north of the Salvation Army Divisional Camp and Retreat. Therefore, we have a vested interest in the proceedings occurring on and in that camp as they will directly affect our daily operations. Our comments are outlined below.

- 1. We strongly disagree with the "less than significant impact" finding on the issue of compatibility with existing land use in the community. Using the figures presented in this document, the Salvation Army will increase by 400% the amount of people inhabiting their camp, potentially all-year long. That is not compatible with the character of the Mussey Grade Road community and of Mussey Grade Road itself. A rural setting is desired by the Salvation Army's neighbors, not a resort setting. Increasing the amount of people inhabiting that camp by 400% is definitely not compatible with the existing land use of the community.
- 2. We also disagree with the statement that no "agricultural resources or operations (have) been identified in the immediate vicinity." Golden Eagle West is an agricultural operation we raise Thoroughbred horses and irrigate land. Prior to the establishment of Golden Eagle West, Spearl Ellison raised Quarter horses and farmed on this property.

Therefore, there is a history of agricultural operations being conducted on this property. Why did the Department of Planning and Land Use overlook this piece of history?

- 3. This proposal will significantly disrupt the character of the Mussey Grade Road environment, contrary to the "less than significant impact" finding concerning the disruption of an established community. The Department of Planning and Land Use assumes Mussey Grade Road will eventually become a high-density area within the 20-year time frame proposed by the Salvation Army for completion of its expansion. That is an invalid assumption. From our personal experience we have discovered that the residents are extremely thankful that the property we occupy was not purchased for development. There is no interest within the Mussey Grade Road community for intense development to occur in this area. There is also no doubt that if the Salvation Army proceeds with its expansion plans a different atmosphere will pervade the Mussey Grade Road community the atmosphere of a resort community. The residents do not want that type of atmosphere.
- 4. The finding that the proposal will not significantly impact growth either directly or indirectly is erroneous. The Salvation Army proposal will directly induce substantial growth in the area simply by virtue of the amount of people visiting its facility. Secondly, the Salvation Army proposal will indirectly induce growth by introducing a large number of people to the rural setting of Mussey Grade Road and Ramona. These people will look favorably on this environment and may wish to locate here.
- 5. In the Salvation Army's proposal the 6" water line under Mussey Grade Road will be replaced by an 8" water line. Who or what will bear the financial responsibility for that construction? That issue is not addressed in the documentation. If the Salvation Army pays for the expansion of the water line, then there is the potential no new water service customers will be needed or desired. However, if the community water system bears the cost of this expansion, then it will either actively seek more water customers to defray the cost of the expansion or raise water rates for existing customers. The issue of who will bear the cost of replacing the water line needs to be addressed.
- 6. We are encouraged by the Department's requirement for a geologic reconnaissance, steep slope analysis, etc. to address the issue of erosion. From our limited experience here erosion can be severe, and a large amount of soil can be displaced by run-off. Rainwater is channeled down Mussey Grade Road; more soil does not need to accumulate in the Mussey Grade drainage. The potential for erosion is significant.
- 7. We are extremely concerned about the possibility of a wastewater treatment facility located near our property. All of our water is supplied by water wells, and we do not want water quality jeopardized by a wastewater treatment facility. We think an extremely well-designed groundwater study is imperative because there is the possibility for a significant adverse effect on groundwater quality. We also have no idea where that wastewater facility will be located. If it is located near our property line, we will oppose its location there in as strong a manner as possible. One issue we did not see addressed

in this documentation was the total amount of potable water required per day by the Salvation Army when the camp is at full occupancy.

- 8. After reading the comments made by the Department of Planning and Land Use regarding transportation/circulation, we suggest one of your staff members observe traffic at the corner of Mussey Grade Road and Highway 67 from approximately 3:30 p.m. to 6:30 p.m. Then you will see how erroneous your conclusions are about the "less than significant impact" the Salvation Army project will have on transportation along Mussey Grade Road. Increased transportation on Mussey Grade Road will even more negatively impact that dangerous intersection. How can 789 people at peak capacity at the Salvation Army Camp traveling along Mussey Grade Road not negatively impact traffic? Even if only 25% of those people were capable of driving cars, there would be an additional 197 cars on Mussey Grade Road under peak occupancy. There needs to be a traffic light at that intersection under existing conditions. By the way, there currently is no bike lane along Mussey Grade Road, and there definitely is a problem with drivers passing cyclists on that roadway.
- one way to exit the area. While the Salvation Army proposed resort may not interfere with the Operational Area Emergency or the Operational Site Specific Dam Failure Evacuation Plans, the increased amount of visitors at the Salvation Army resort will definitely impact with the occupants along Mussey Grade Road during an evacuation emergency. How could a peak number of 789 people not significantly impact evacuation procedures during an emergency on a dead-end street? Additional fire rings will be constructed in remote overnight camping areas in a location with a high fire hazard rating. That raises significant concerns. Contrary to your statements in this document, there will be a significant impact upon fire and police protection in the area. Currently there are only four deputy sheriffs on duty per shift in Ramona. Limited police protection already exists; an increased population at the Salvation Army resort will certainly stress current police and fire protection resources.
- 10. We are concerned about the noise that will be generated from the Salvation Army resort. Can you tell us if they will be using all-terrain recreational vehicles on their property for their guests?
- 11. It states in this document "the proposed project also would not change the visual relationship between the subject site and the community." We are particularly concerned about this because grading already has occurred on the north edge of the Salvation Army property adjacent to our south boundary line. Is this where they plan to construct the two-story conference center? We can only assume that is a possibility since disturbance has already occurred plus someone erected stakes in the ground. If the conference center is constructed adjacent to our property line, then the visual relationship between our two properties will definitely be changed. Our livestock could also be negatively affected by noise and human disturbance.

There is a question in this documentation that asks whether this project by the Salvation Army has the potential to degrade the quality of the environment. That question is in reference to plant and animal species. However, the residents along Mussey Grade Road deserve quality in their environment also, and we believe this proposed resort will negatively affect the quality of the human environment we are currently enjoying. The Salvation Army undoubtedly thought they were enhancing the area by proposing this resort. They will discover, however, that the citizens along Mussey Grade Road are not interested in their peaceful environment being continually disturbed by outside visitors.

Sincerely,

John C. Mabee, Owner Golden Eagle West

Betty L. Mabee, Owner Golden Eagle West



San Diego County Archaeological Society

Environmental Review Committee

13 April 2000

To:

Dr. Glenn S. Russell

Department of Planning and Land Use

County of San Diego 5201 Ruffin Road, Suite B

San Diego, California 92123-1666

Subject:

Notice of Preparation of a Draft Environmental Impact Report

Salvation Army Divisional Camp and Retreat Specific Plan

MUP P70-379W², Log No. 98-14-023

Dear Dr. Russell:

Thank you for the subject Notice of Preparation for the subject project, received by this Society last month.

We are pleased to note the inclusion of cultural resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the County's environmental review process for this project.

Sincerely,

Environmental Review Committee

cc:

SDCAS President

file